

Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section
From: Bobby Bull, New Source Review Section *rlb*
Date: November 23, 2010
Subject: Draft Minor Source Air Construction Permit
Project No. 0950137-032-AC
Orlando Utilities Commission, Stanton Energy Center
Maximum Heat Input Rate for Units 1 and 2

Attached for your review is a draft minor air construction permit package for the Stanton Energy Center (SEC), which is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. Briefly, the draft permit reestablishes the maximum heat input rate for Units 1 and 2 from 4,286 MMBtu/hr to 4,800 MMBtu/hr. The new heat input limit will be a recognized limit based on a 4-hour average. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. I recommend your approval of the attached draft permit package. Day 90 for the project is December 24, 2010.

Attachments

TLV/jfk/rlb

P.E. CERTIFICATION STATEMENT

PERMITTEE

Orlando Utilities Commission
Reliable Plaza
100 West Anderson
Orlando, FL 32802


Project No. 0950137-032-AC
Stanton Energy Center
Minor Source Air Construction Permit
Maximum Heat Input Rates - Units 1 and 2
Orange County, Florida

PROJECT DESCRIPTION

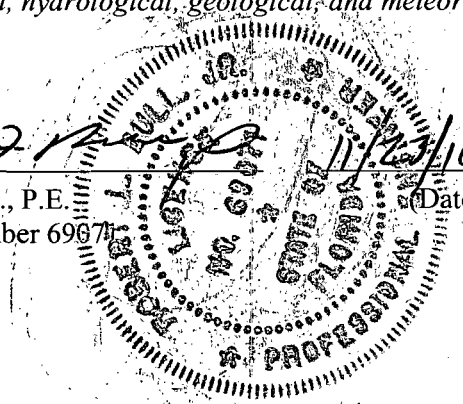
The applicant proposes to reestablish the maximum heat input rates for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The facility has shown the capacity to operate at the higher heat input level, and no emissions increases are anticipated for the criteria pollutants. The new rates will be based on a 4 hour average and will be recognized as the permitted limit for each unit.

The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Robert L. Bull, Jr., P.E. (Date)
Registration Number 69071





Florida Department of Environmental Protection

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

November 23, 2010

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

Ms. Denise M. Stalls
Vice President – Human and Environmental Resources Department
Orlando Utilities Commission (OUC)
Stanton Energy Center
Reliable Plaza
100 West Anderson
Orlando, Florida 32802

Re: Project No. 0950137-032-AC
Orlando Utilities Commission- Stanton Energy Center
Minor Air Construction Permit
Maximum Heat Input Rates for Units 1 and 2

Dear Ms. Stalls:

On April 2, 2010, you submitted an application requesting recognition of the maximum heat input rates for Units 1 and 2. This facility is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Bobby Bull, P.E., at 850/921-7744.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/rlb

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Bureau of Air Regulation, Division of Air Resource Management
Draft Minor Air Construction Permit
Project No. 0950137-032-AC
Orlando Utilities Commission, Stanton Energy Center
Orange County, Florida

Applicant: The applicant for this project is the Orlando Utilities Commission. The applicant's authorized representative and mailing address is: Denise M. Stalls, Vice President of Human and Environmental Resources Department, Stanton Energy Center, Reliable Plaza, 100 West Anderson, Orlando, FL 32802.

Facility Location: The Orlando Utilities Commission operates the existing Stanton Energy Center, which is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida.

Project: The applicant proposes to reestablish the maximum heat input rates for Units 1 and 2 from 4,286 million british thermal units per hour (MMBtu/hour) to 4,800 MMBtu/hour. The new rates will be based on a 4-hour average and will be recognized as the permitted limit for each unit. As originally constructed, these units have demonstrated higher heat input rates than the original design specifications.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Bureau of Air Regulation, New Source Review Section in the Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for

(Public Notice to be Published in the Newspaper)

an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Orlando Utility Commission
Reliable Plaza, 100 West Anderson
Orlando, FL 32802

Project No. 0950137-032-AC
Minor Air Construction Permit
Orange County, Florida
Stanton Energy Center
Maximum Heat Input Rates for Units 1 and 2

Authorized Representative:
Denise M. Stalls, Vice President
Human and Environmental Resources Department

Facility Location: Orlando Utilities Commission operates the existing Stanton Energy Center, which is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida.

Project: The applicant proposes to reestablish the maximum heat input rates for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The new rates will be based on a 4-hour average and will be recognized as the permitted limit for each unit. As originally constructed, these units have demonstrated higher heat input rates than the original design specifications. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Bureau of Air Regulation, New Source Review Section in the Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet 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 Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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, F.A.C.

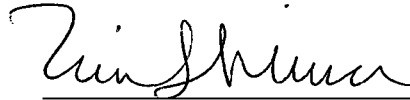
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

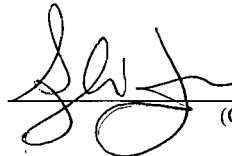
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 11/23/10 to the persons listed below.

- Ms. Denise M. Stalls, OUC (dstalls@ouc.com)
- Mr. David Baez, OUC (dbaez@ouc.com)
- Mr. Scott Osbourn, P.E., Golder Associates, Inc. (sosbourn@golder.com)
- Ms. Kathleen Forney, U.S. EPA, Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Heather Abrams, U.S. EPA, Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Ana Oquendo, U.S. EPA, Region 4 (oquendo.ana@epa.gov)
- Mr. Hamp Pridgen, Orange County EPD (hamp.pridgen@ocfl.net)
- Ms. Caroline Shine, DEP Central District (caroline.shine@dep.state.fl.us)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

11/23/10
(Date)



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Orlando Utilities Commission
Reliable Plaza, 100 West Anderson
Orlando, FL 32802

Stanton Energy Center
Facility ID No. 0950137

PROJECT

Project No. 0950137-032-AC
Application for Minor Air Construction Permit
Maximum Heat Input Rates for Units 1 and 2

COUNTY

Orange County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation – New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

November 23, 2010

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

The Stanton Energy Center is an existing electric services facility, which is categorized under Standard Industrial Classification Code No. 4911. The facility is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. The UTM coordinates of the existing facility are Zone 17, 483.5 km East, and 3150.6 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has units subject to the acid rain provisions of the Clean Air Act.
- 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 in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The applicant proposes to reestablish the maximum heat input rates identified in its permit for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The new rates will be based on a 4 hour average and will be recognized as the permitted limit for each unit.

In the original PSD permit (PSD-FL-084) and site certification permit (PA 81-14), the heat input rate was identified as 4,136 MMBtu/hr for both units. At the time, only Unit 1 was constructed. Unit 2 was modified under PSD-FL-084, and its heat input rate was specified as 4,268 MMBtu/hr. Under site certification modification PA 81-14/SA1, the heat input for Unit 1 was increased to 4,286 MMBtu/hr prior to incorporation into the facility's initial Title V permit (0950137-001-AV). At no point does the PSD, site certification, or Title V permits specify an averaging period for the heat input, nor was the heat input limit language added to the Title V permit to act as a recognized limit. In addition, the following permitting note was incorporated into the facility's operating permit during the facility's last Title V renewal.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

{Permitting Note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability. To address OUC's concerns related to the heat input limitations, OUC will submit an application for an air construction permit revision no later than April 1, 2010. A change in the heat input limitation and/or a change in the method of determining compliance with the heat input limitations will be established through the issuance of an air construction permit in the near future. As such, this permitting note will not be valid after a final air construction permit has been issued by the Department or December 31, 2010, whichever occurs sooner.}

Based on this language, the applicant would need to revise the heat input limit as permitted in the original air construction permit or have to accept the 4,286 MMBtu/hour as a recognized limit for each unit. The applicant submitted an electronic copy of the application for the requested changes in accordance with this permitting note on April 1, 2010. The hard copy of the application was received by the Department on April 2, 2010.

Processing Schedule

April 1, 2010	Applicant submitted an electronic application for a minor source air pollution construction permit.
April 2, 2010	Received the hard copy application for a minor source air pollution construction permit.
April 28, 2010	Requested additional information.
July 27, 2010	Request for an additional 30 days by the applicant granted by the Department.
August 26, 2010	Request for an additional 30 days by the applicant granted by the Department.
September 25, 2010	Received additional information; complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m³, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

Both Units 1 and 2 have an identified heat input of 4,286 MMBtu/hour and each have a power output 468 MW/unit. The permittee has requested the maximum heat input rates be increased to 4,800 MMBtu/hour on a 4-hour average at 468 MW. Since the applicant has requested a higher operating capacity for both units a PSD applicability review is required for this project. As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	2-year Emissions Averaging Period	Actual Emissions (TPY)	Project Projected Actual Emissions (TPY)- No Impact	Net Increase (TPY)	Significant Emissions Rate (TPY)	Subject To PSD?
CO	2005-2006	4,402	4,402	0	100	No
NO _x	2005-2006	9,509	9,509	0	40	No
PM/PM ₁₀	2006-2007	265/265	265/265	0	25/15	No
SO ₂	2005-2006	8,482	8,482	0	40	No
VOC	2005-2006	34	34	0	40	No

As shown in the above table, the applicant anticipates the total project emissions will not be impacted. In most cases, an increase in the heat input would show emissions increases based on the higher fuel capacity. However, the applicant has shown that both Units 1 and 2 have historically operated at higher heat input levels to achieve the maximum permitted power output of 468 MW. The permittee anticipates the units operating at the same heat input levels with no increases in emissions for any PSD or regulated pollutants; therefore, the project is not subject to PSD preconstruction review. In addition, the permittee acknowledges that the new 4-hour average will require the operators to carefully monitor operations to ensure compliance.

3. DEPARTMENT REVIEW

The Department reviewed heat input data from each unit’s CEMS database. This information was collected from the EPA acid rain data base for years 2005 through the first quarter of 2010. Missing data for 2008 and 2009 was provided by the permittee. All information provided was unbiased CEMS data as collected for submittal to EPA

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

prior to applying an EPA emission factor for the missing data. The Department verified the applicant's claim that both units have consistently operated at heat input values higher than the value stated in the original PSD permit and current Title V permit based on CEM acid rain data. Attached are Figures 1 and 2 which demonstrate each unit's ability to operate at higher heat input levels and within 4% (450 MW or higher) of the maximum power output of 468 MW.

In the original PSD permit (PSD-FL-084) and site certification permit (PA 81-14), the identified heat input rate was 4,136 MMBtu/hr for both units. At the time, only Unit 1 was constructed. Unit 2 was modified under PSD-FL-084, and its heat input rate was specified as 4,268 MMBtu/hr. Under site certification modification PA 81-14/SA1, the heat input for Unit 1 was increased to 4,286 MMBtu/hr prior to incorporation into the facility's initial Title V permit (0950137-001-AV). At no point does the PSD, site certification, or Title V permits specify a specific averaging period for the heat input, nor was the heat input limit language added to the Title V permit to act as a recognized limit. Once the maximum heat input rates were incorporated into the operating permit, the heat input rates were not recognized as a limit but as a target to be met during annual compliance testing because of the permitting note. The heat input was never considered a limit by the facility which has operated both units at higher heat input rates since their respected inceptions including compliance testing.

The Department notes that the original BACT standards for SO₂, NO_x, and PM were based on the original specified heat input rate. The NO_x and SO₂ BACT standards were in terms of lb/MMBtu and will be unaffected by the change in the maximum heat input rate. The PM BACT standard is specified in terms of both lb/MMBtu and lb/hour, however; the applicant has not requested any change to the mass-based emission standards. Historic stack tests show compliance with the current mass-based standards at heat input rates well above 4,136 and 4,268 MMBtu/hr. Therefore, no change will be made to these emission standards.

Since the applicant is currently operating at this higher heat input, there should be no emission increases from Units 1 and 2. The Department will allow the higher heat input rates. The permittee is required to submit emission data for 10 years since this is a capacity increase project.

4. PRELIMINARY DETERMINATION

The Department's New Source Review Section makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Bobby Bull, P.E., is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Figure 1. SEC Unit 1 4-Hr Average Output > 450 MW

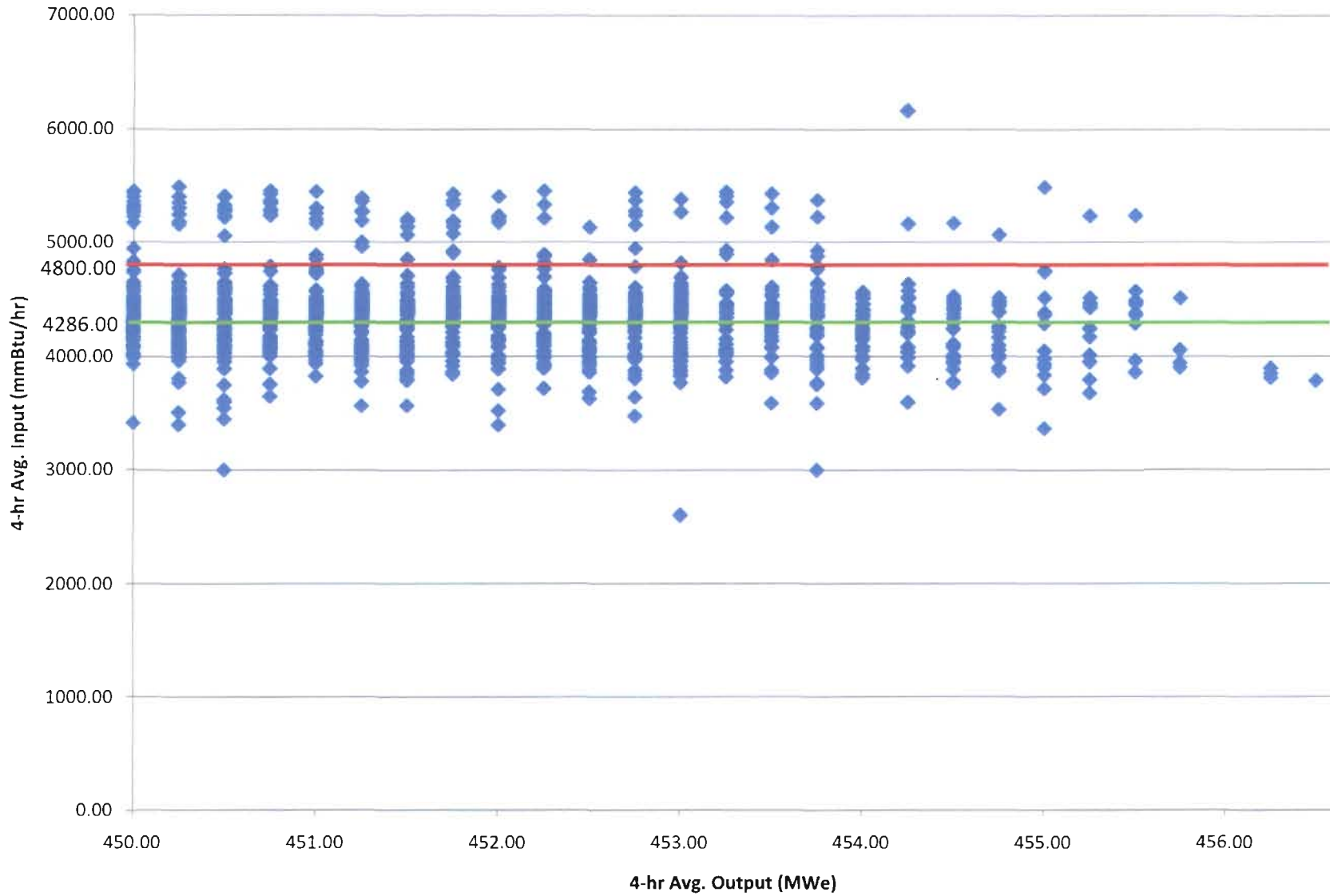
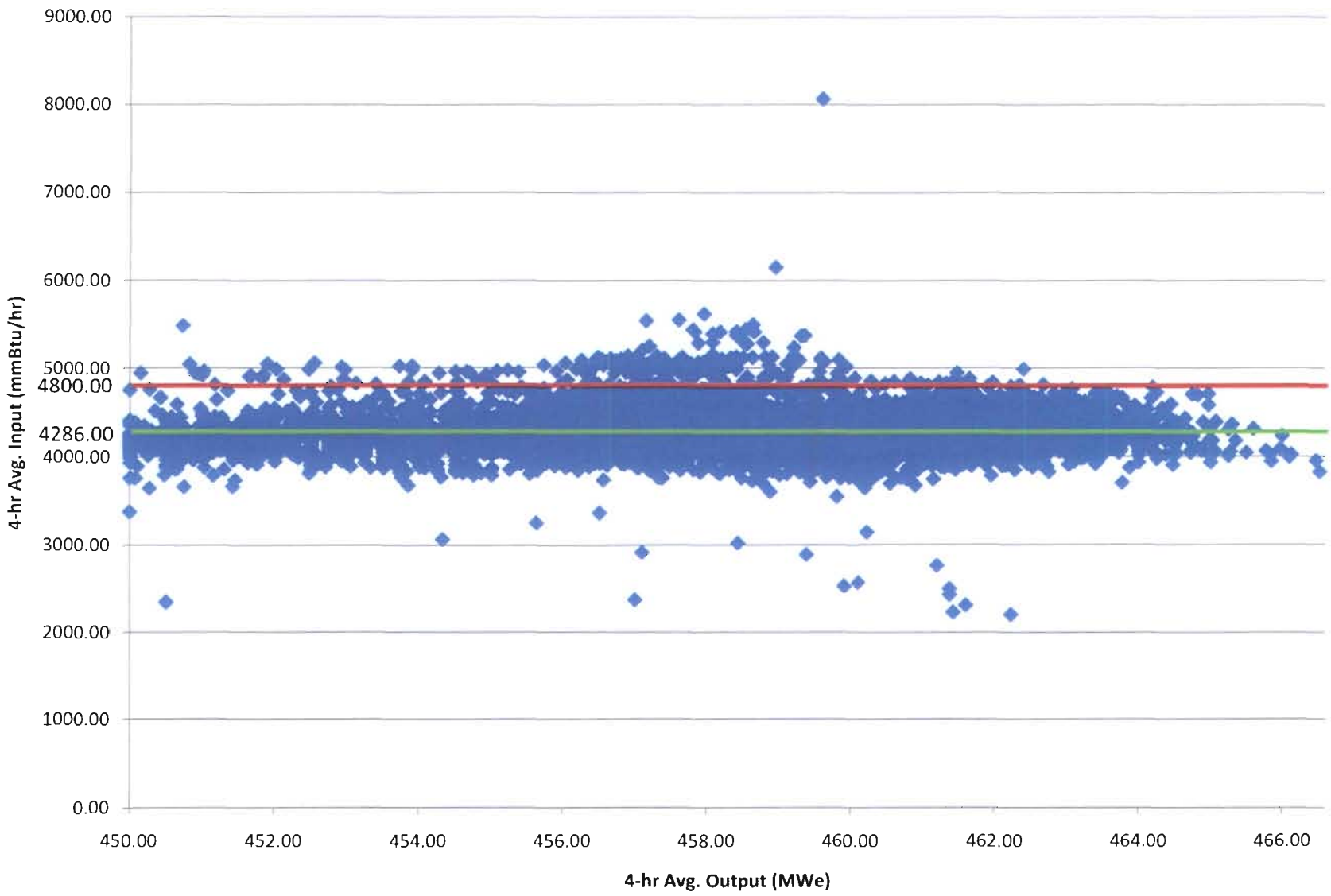


Figure 2. SEC Unit 2 4-Hr Average Output > 450 MW



DRAFT PERMIT

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Orlando Utilities Commission
Reliable Plaza
100 West Anderson
Orlando, FL 32802

Air Permit No. 0950137-032-AC
Permit Expires: December 31, 2011

Stanton Energy Center
Minor Source Air Construction Permit
Maximum Heat Input Rates - Units 1 & 2

Authorized Representative:
Denise M. Stalls, V.P., Human and Environmental Resources

This is the final air construction permit, which reestablishes the maximum heat input rates for Units 1 and 2. The proposed work will be conducted at the Stanton Energy Center, which is an energy services facility (Standard Industrial Classification No. 4911). The facility is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. The UTM coordinates are Zone 17, 483.5 km East, and 3150.6 km North.

This final permit is organized into the following sections: Section 1 (General Information), Section 2 (Administrative Requirements), Section 3 (Permit Revisions), and Section 4 (Appendices). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit. Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

DRAFT

Joseph Kahn, Director
Division of Air Resource Management

(Date)

AIR CONSTRUCTION PERMIT (DRAFT)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

- Ms. Denise M. Stalls, OUC (dstalls@ouc.com)
- Mr. David Baez, OUC (dbaez@ouc.com)
- Mr. Scott Osbourn, P.E., Golder Associates, Inc. (sosbourn@golder.com)
- Ms. Kathleen Forney, U.S. EPA, Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Heather Abrams, U.S. EPA, Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Ana Oquendo, U.S. EPA, Region 4 (oquendo.ana@epa.gov)
- Mr. Hamp Pridgen, Orange County EPD (hamp.pridgen@ocfl.net)
- Ms. Caroline Shine, DEP Central District (caroline.shine@dep.state.fl.us)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILED AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Orlando Utilities Commission (OUC) operates the Curtis H. Stanton Energy Center, which is an existing energy services facility (SIC No. 4911). The facility site is located 144 km southeast from the Chassahowitzka National Wildlife Area; the nearest Federal Prevention of Significant Deterioration (PSD) Class I Area.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Fossil Fuel Fired Steam Electric Generator No. 1
002	Fossil Fuel Fired Steam Electric Generator No. 2
003	Auxiliary Boiler
004	Coal Transfer Baghouse
005	Coal Crusher Building Baghouse
006	Coal Plant Transfer and Silo Fill Area #1 Baghouse
007	Coal Plant Transfer and Silo Fill Area #2 Baghouse
008	Limestone Day Bin Baghouse
009	Pebble Lime Receiving Hopper Baghouse
010	Coal Reclaim Hopper Baghouse
011	Flyash Exhauster Filter #1 Baghouse
012	Flyash Exhauster Filter #2 Baghouse
013	Flyash Exhauster Filter #3 Baghouse
014	Flyash Exhauster Filter #4 Baghouse
015	Flyash Silo Bin Vent Filter Baghouse
016	Adipic Acid Storage Baghouse
025	Stanton Unit A- Combined-Cycle Combustion Turbine
026	Stanton Unit A- Combined-Cycle Combustion Turbine
028	Distillate Fuel Oil Storage Tank
029	Flyash Silo Bin Vent Filter Baghouse
037	Stanton Unit B - 300 MW Combined Cycle Combustion Turbine
038	Stanton Unit B - Cooling Tower
039	Stanton Unit B - Distillate Fuel Oil Storage Tank
041	500 kW Emergency Generator at the Stanton A Plant Site
<i>Unregulated Emissions Units and Activities</i>	
017	Material Handling
018	Fuel Storage Tanks
019	Water Treatment
020	Unconfined Emissions

SECTION 1. GENERAL INFORMATION (DRAFT)

021	Surface Coating and Solvent Cleaning
022	General Purpose Engines
023	Helper Cooling Towers
024	Emergency Generators
027	Mechanical Draft Cooling Tower
036	Inline Insertable Dust Collector
040	Natural Draft Cooling Towers

Proposed Project

This permit reestablished the maximum heat input rates for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The new rate will be based on a 4-hour average and will be recognized as the permitted limit for each unit.

This project will modify the following emissions units.

Facility ID No. 0950137	
ID No.	Emission Unit Description
001	Fossil Fuel Fired Steam Electric Generator No. 1
002	Fossil Fuel Fired Steam Electric Generator No. 2

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has units subject to the acid rain provisions 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 in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, FL 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 is: Air Resources Section, 3319 Maguire Road, Suite 232, Orlando, FL 32803-3767.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms; and
 - b. Appendix B. 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: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be 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. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after 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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual NO_x, SO₂, and CO emissions for the following units: Emissions Units 001 and 002- Fossil Fuel Fired Steam Electric Generators No. 1 and No. 2.

[Application 0950137-032-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. PERMIT REVISIONS (DRAFT)

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

PERMIT BEING MODIFIED: PERMIT NO. PSD-FL-084

Affected Emissions Units: Coal Fired Boilers Units 1 and 2 (EU 001 and EU 002)

1. The proposed steam generating station shall be constructed and operated in accordance with the capabilities and specifications of the application including the ~~4,136~~ 4,800 MMBtu/hr maximum heat input rate (4-hour rolling average) for Unit 1 and the ~~4,286~~ 4,800 MMBtu/hr maximum heat input rate (4-hour rolling average) for Unit 2.

SECTION 4. APPENDICES (DRAFT)

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

CFR: Code of Federal Regulations	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscf: dry standard cubic feet	ppmv: parts per million by volume
dscfm: dry standard cubic feet per minute	ppmvd: parts per million by volume, dry basis
EPA: Environmental Protection Agency	QA: quality assurance
ESP: electrostatic precipitator (control system for reducing particulate matter)	QC: quality control
EU: emissions unit	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SIP: State Implementation Plan
gr: grains	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
HAP: hazardous air pollutant	SO₂: sulfur dioxide
Hg: mercury	TPD: tons/day
I.D.: induced draft	TPH: tons per hour
ID: identification	TPY: tons per year
kPa: kilopascals	TRS: total reduced sulfur
lb: pound	UTM: Universal Transverse Mercator coordinate system
MACT: maximum achievable technology	VE: visible emissions
MMBtu: million British thermal units	VOC: volatile organic compounds
MSDS: material safety data sheets	
MW: megawatt	

SECTION 4. APPENDIX B (DRAFT)

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 403.141, 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 403.987(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 of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B (DRAFT)

General Conditions

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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with 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 (applicable); and
 - c. Compliance with New Source Performance Standards (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 for 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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. 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 the 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.

Livingston, Sylvania

From: Livingston, Sylvania
Sent: Tuesday, November 23, 2010 3:12 PM
To: 'dstalls@ouc.com'
Cc: 'dbaez@ouc.com'; 'sosbourn@golder.com'; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'oquendo.ana@epa.gov'; 'hamp.pridgen@ocfl.net'; Shine, Caroline; Gibson, Victoria; 'Veronica_Figueroa@golder.com'; Bull, Robert; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC
Attachments: 0950137-032-AC_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.032.AC.D_pdf.zip

Owner/Company Name: ORLANDO UTILITIES COMMISSION

Facility Name: STANTON ENERGY CENTER

Project Number: 0950137-032-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

Facility County: ORANGE

Processor: Robert Bull

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Stalls, Denise M. [DStalls@ouc.com]
Sent: Tuesday, November 23, 2010 3:22 PM
To: Livingston, Sylvia
Subject: RE: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Received, thank you.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, November 23, 2010 3:12 PM
To: Stalls, Denise M.
Cc: Baez, David R.; sosbourn@golder.com; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; oguendo.ana@epa.gov; hamp.pridgen@ocfl.net; Shine, Caroline; Gibson, Victoria; [Veronica Figueroa@golder.com](mailto:Veronica.Figueroa@golder.com); Bull, Robert; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.032.AC.D_pdf.zip

Owner/Company Name: ORLANDO UTILITIES COMMISSION
Facility Name: STANTON ENERGY CENTER
Project Number: 0950137-032-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: ORANGE
Processor: Robert Bull

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Division of Air Resource Management (DARM)

Livingston, Sylvia

From: Baez, David R. [DBaez@ouc.com]
Sent: Tuesday, November 23, 2010 3:24 PM
To: Livingston, Sylvia
Subject: RE: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Ms Livingston,

I can review the documents

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: Livingston, Sylvia [<mailto:Sylvia.Livingston@dep.state.fl.us>]
Sent: Tuesday, November 23, 2010 3:12 PM
To: Stalls, Denise M.
Cc: Baez, David R.; sosbourn@golder.com; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; quendo.ana@epa.gov; hamp.pridgen@ocfl.net; Shine, Caroline; Gibson, Victoria; Veronica_Figueroa@golder.com; Bull, Robert; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.032.AC.D_pdf.zip

Owner/Company Name: ORLANDO UTILITIES COMMISSION
Facility Name: STANTON ENERGY CENTER
Project Number: 0950137-032-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: ORANGE
Processor: Robert Bull

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the

engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew 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.

Livingston, Sylvia

From: Figueroa, Veronica [Veronica_Figueroa@golder.com]
Sent: Tuesday, November 23, 2010 3:27 PM
To: Livingston, Sylvia
Subject: RE: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

I have successfully viewed the documents.

Thank you, Veronica

Veronica Figueroa | Staff Engineer | Golder Associates Inc.
5100 West Lemon Street, Suite 208, Tampa, Florida, USA 33609
T: +1 (813) 287-1717 | D: +1 (813) 769-5317 | F: +1 (813) 287-1716 | C: +1 (407) 484-3640 | E:
Veronica_Figueroa@golder.com | www.golder.com

Work Safe, Home Safe

This email transmission is confidential and may contain proprietary information for the exclusive use of the intended recipient. Any use, distribution or copying of this transmission, other than by the intended recipient, is strictly prohibited. If you are not the intended recipient, please notify the sender and delete all copies. Electronic media is susceptible to unauthorized modification, deterioration, and incompatibility. Accordingly, the electronic media version of any work product may not be relied upon.

Golder, Golder Associates and the GA globe design are trademarks of Golder Associates Corporation

Please consider the environment before printing this email.

From: Livingston, Sylvia [<mailto:Sylvia.Livingston@dep.state.fl.us>]
Sent: Tuesday, November 23, 2010 3:12 PM
To: dstalls@ouc.com
Cc: dbaez@ouc.com; Osbourn, Scott; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; oguendo.ana@epa.gov; hamp.pridgen@ocfl.net; Shine, Caroline; Gibson, Victoria; Figueroa, Veronica; Bull, Robert; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.032.AC.D_pdf.zip

Owner/Company Name: ORLANDO UTILITIES COMMISSION
Facility Name: STANTON ENERGY CENTER
Project Number: 0950137-032-AC
Permit Status: DRAFT

Permit Activity: CONSTRUCTION

Facility County: ORANGE

Processor: Robert Bull

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew 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.

Livingston, Sylvania

From: Livingston, Sylvania
Sent: Tuesday, November 23, 2010 3:31 PM
To: 'jodi.dittell@ocfl.net'
Subject: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC
Attachments: 0950137-032-AC_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.032.AC.D.pdf.zip

Owner/Company Name: ORLANDO UTILITIES COMMISSION

Facility Name: STANTON ENERGY CENTER

Project Number: 0950137-032-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

Facility County: ORANGE

Processor: Robert Bull

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>

Livingston, Sylvia

From: Jodi.Dittell@ocfl.net
Sent: Tuesday, November 23, 2010 4:17 PM
To: Livingston, Sylvia
Subject: RE: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Sylvia,

Just as an FYI – Hamp Pridgen has been retired for over a year. You can replace his name with mine.

Happy Thanksgiving!

Jodi D. Dittell
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division
phone: 407-836-1419
fax: 407-836-1498
www.ocepd.org

From: Livingston, Sylvia [<mailto:Sylvia.Livingston@dep.state.fl.us>]
Sent: Tuesday, November 23, 2010 3:31 PM
To: Dittell, Jodi
Subject: Orlando Utilities Commission - Stanton Energy Center; 0950137-032-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.032.AC.D_pdf.zip

Owner/Company Name: ORLANDO UTILITIES COMMISSION
Facility Name: STANTON ENERGY CENTER
Project Number: 0950137-032-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: ORANGE
Processor: Robert Bull

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew 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.

PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.

Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section *JK*
From: Bobby Bull, New Source Review Section *RLB*
Date: November 30, 2010
Subject: Draft Minor Source Air Construction Permit
Project No. 0950137-032-AC
Orlando Utilities Commission, Stanton Energy Center
Maximum Heat Input Rate for Units 1 and 2

Attached for your review is the revised draft minor air construction permit package for the Stanton Energy Center (SEC), which is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. Briefly, the draft permit reestablishes the maximum heat input rate for Units 1 and 2 from 4,286 MMBtu/hr to 4,800 MMBtu/hr. The new heat input limit will be a recognized limit based on a 4-hour block average. The original draft permit indicated a 4-hour rolling average. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. I recommend your approval of the attached draft permit package. Day 90 for the project is December 24, 2010.

Attachments

TLV/jfk/rlb

P.E. CERTIFICATION STATEMENT

PERMITTEE

Orlando Utilities Commission
Reliable Plaza
100 West Anderson
Orlando, FL 32802

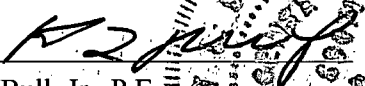
Project No. 0950137-032-AC
Stanton Energy Center
Minor Source Air Construction Permit
Maximum Heat Input Rates - Units 1 and 2
Orange County, Florida

PROJECT DESCRIPTION

The applicant proposes to reestablish the maximum heat input rates for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The facility has shown the capacity to operate at the higher heat input level, and no emissions increases are anticipated for the criteria pollutants. The new rates will be based on a 4-hour block average and will be recognized as the permitted limit for each unit.

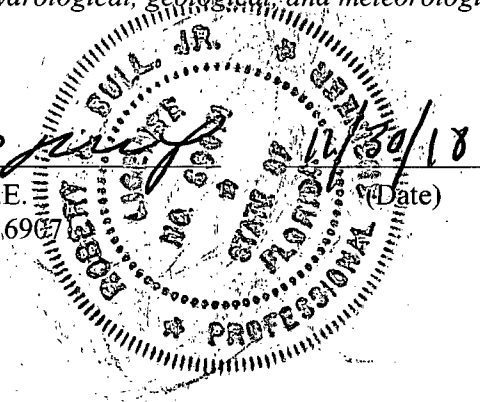
The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Robert L. Bull, Jr., P.E.
Registration Number 6907

12/20/18
(Date)



PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Bureau of Air Regulation, Division of Air Resource Management
Draft Minor Air Construction Permit
Project No. 0950137-032-AC
Orlando Utilities Commission, Stanton Energy Center
Orange County, Florida

Applicant: The applicant for this project is the Orlando Utilities Commission. The applicant's authorized representative and mailing address is: Denise M. Stalls, Vice President of Human and Environmental Resources Department, Stanton Energy Center, Reliable Plaza, 100 West Anderson, Orlando, FL 32802.

Facility Location: The Orlando Utilities Commission operates the existing Stanton Energy Center, which is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida.

Project: The applicant proposes to reestablish the maximum heat input rates for Units 1 and 2 from 4,286 million british thermal units per hour (MMBtu/hour) to 4,800 MMBtu/hour. The new rates will be based on a 4-hour block average and will be recognized as the permitted limit for each unit. As originally constructed, these units have demonstrated higher heat input rates than the original design specifications.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Bureau of Air Regulation, New Source Review Section in the Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for

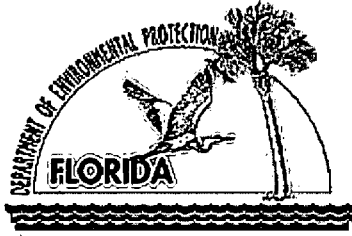
(Public Notice to be Published in the Newspaper)

an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Orlando Utilities Commission
Reliable Plaza, 100 West Anderson
Orlando, FL 32802

Stanton Energy Center
Facility ID No. 0950137

PROJECT

Project No. 0950137-032-AC
Application for Minor Air Construction Permit
Maximum Heat Input Rates for Units 1 and 2

COUNTY

Orange County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation – New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

November 30, 2010

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

The Stanton Energy Center is an existing electric services facility, which is categorized under Standard Industrial Classification Code No. 4911. The facility is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. The UTM coordinates of the existing facility are Zone 17, 483.5 km East, and 3150.6 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has units subject to the acid rain provisions of the Clean Air Act.
- 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 in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The applicant proposes to reestablish the maximum heat input rates identified in its permit for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The new rates will be based on a 4-hour block average and will be recognized as the permitted limit for each unit.

In the original PSD permit (PSD-FL-084) and site certification permit (PA 81-14), the heat input rate was identified as 4,136 MMBtu/hr for both units. At the time, only Unit 1 was constructed. Unit 2 was modified under PSD-FL-084, and its heat input rate was specified as 4,268 MMBtu/hr. Under site certification modification PA 81-14/SA1, the heat input for Unit 1 was increased to 4,286 MMBtu/hr prior to incorporation into the facility's initial Title V permit (0950137-001-AV). At no point does the PSD, site certification, or Title V permits specify an averaging period for the heat input, nor was the heat input limit language added to the Title V permit to act as a recognized limit. In addition, the following permitting note was incorporated into the facility's operating permit during the facility's last Title V renewal.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

{Permitting Note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability. To address OUC's concerns related to the heat input limitations, OUC will submit an application for an air construction permit revision no later than April 1, 2010. A change in the heat input limitation and/or a change in the method of determining compliance with the heat input limitations will be established through the issuance of an air construction permit in the near future. As such, this permitting note will not be valid after a final air construction permit has been issued by the Department or December 31, 2010, whichever occurs sooner.}

Based on this language, the applicant would need to revise the heat input limit as permitted in the original air construction permit or have to accept the 4,286 MMBtu/hour as a recognized limit for each unit. The applicant submitted an electronic copy of the application for the requested changes in accordance with this permitting note on April 1, 2010. The hard copy of the application was received by the Department on April 2, 2010.

Processing Schedule

April 1, 2010	Applicant submitted an electronic application for a minor source air pollution construction permit.
April 2, 2010	Received the hard copy application for a minor source air pollution construction permit.
April 28, 2010	Requested additional information.
July 27, 2010	Request for an additional 30 days by the applicant granted by the Department.
August 26, 2010	Request for an additional 30 days by the applicant granted by the Department.
September 25, 2010	Received additional information; complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m³, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

Both Units 1 and 2 have an identified heat input of 4,286 MMBtu/hour and each have a power output 468 MW/unit. The permittee has requested the maximum heat input rates be increased to 4,800 MMBtu/hour on a 4-hour block average at 468 MW. Since the applicant has requested a higher operating capacity for both units a PSD applicability review is required for this project. As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	2-year Emissions Averaging Period	Actual Emissions (TPY)	Project Projected Actual Emissions (TPY)- No Impact	Net Increase (TPY)	Significant Emissions Rate (TPY)	Subject To PSD?
CO	2005-2006	4,402	4,402	0	100	No
NO _x	2005-2006	9,509	9,509	0	40	No
PM/PM ₁₀	2006-2007	265/265	265/265	0	25/15	No
SO ₂	2005-2006	8,482	8,482	0	40	No
VOC	2005-2006	34	34	0	40	No

As shown in the above table, the applicant anticipates the total project emissions will not be impacted. In most cases, an increase in the heat input would show emissions increases based on the higher fuel capacity. However, the applicant has shown that both Units 1 and 2 have historically operated at higher heat input levels to achieve the maximum permitted power output of 468 MW. The permittee anticipates the units operating at the same heat input levels with no increases in emissions for any PSD or regulated pollutants; therefore, the project is not subject to PSD preconstruction review. In addition, the permittee acknowledges that the new 4-hour block average will require the operators to carefully monitor operations to ensure compliance.

3. DEPARTMENT REVIEW

The Department reviewed heat input data from each unit’s CEMS database. This information was collected from the EPA acid rain data base for years 2005 through the first quarter of 2010. Missing data for 2008 and 2009 was provided by the permittee. All information provided was unbiased CEMS data as collected for submittal to EPA

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

prior to applying an EPA emission factor for the missing data. The Department verified the applicant's claim that both units have consistently operated at heat input values higher than the value stated in the original PSD permit and current Title V permit based on CEM acid rain data. Attached are Figures 1 and 2 which demonstrate each unit's ability to operate at higher heat input levels and within 4% (450 MW or higher) of the maximum power output of 468 MW.

In the original PSD permit (PSD-FL-084) and site certification permit (PA 81-14), the identified heat input rate was 4,136 MMBtu/hr for both units. At the time, only Unit 1 was constructed. Unit 2 was modified under PSD-FL-084, and its heat input rate was specified as 4,268 MMBtu/hr. Under site certification modification PA 81-14/SA1, the heat input for Unit 1 was increased to 4,286 MMBtu/hr prior to incorporation into the facility's initial Title V permit (0950137-001-AV). At no point does the PSD, site certification, or Title V permits specify a specific averaging period for the heat input, nor was the heat input limit language added to the Title V permit to act as a recognized limit. Once the maximum heat input rates were incorporated into the operating permit, the heat input rates were not recognized as a limit but as a target to be met during annual compliance testing because of the permitting note. The heat input was never considered a limit by the facility which has operated both units at higher heat input rates since their respected inceptions including compliance testing.

The Department notes that the original BACT standards for SO₂, NO_x, and PM were based on the original specified heat input rate. The NO_x and SO₂ BACT standards were in terms of lb/MMBtu and will be unaffected by the change in the maximum heat input rate. The PM BACT standard is specified in terms of both lb/MMBtu and lb/hour, however; the applicant has not requested any change to the mass-based emission standards. Historic stack tests show compliance with the current mass-based standards at heat input rates well above 4,136 and 4,268 MMBtu/hr. Therefore, no change will be made to these emission standards.

Since the applicant is currently operating at this higher heat input, there should be no emission increases from Units 1 and 2. The Department will allow the higher heat input rates. The permittee is required to submit emission data for 10 years since this is a capacity increase project.

4. PRELIMINARY DETERMINATION

The Department's New Source Review Section makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Bobby Bull, P.E., is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Orlando Utilities Commission
Reliable Plaza
100 West Anderson
Orlando, FL 32802

Air Permit No. 0950137-032-AC
Permit Expires: December 31, 2011

Stanton Energy Center
Minor Source Air Construction Permit
Maximum Heat Input Rates - Units 1 & 2

Authorized Representative:
Denise M. Stalls, V.P., Human and Environmental Resources

This is the final air construction permit, which reestablishes the maximum heat input rates for Units 1 and 2. The proposed work will be conducted at the Stanton Energy Center, which is an energy services facility (Standard Industrial Classification No. 4911). The facility is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. The UTM coordinates are Zone 17, 483.5 km East, and 3150.6 km North.

This final permit is organized into the following sections: Section 1 (General Information), Section 2 (Administrative Requirements), Section 3 (Permit Revisions), and Section 4 (Appendices). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit. Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

DRAFT

Joseph Kahn, Director
Division of Air Resource Management

(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

- Ms. Denise M. Stalls, OUC (dstalls@ouc.com)
- Mr. David Baez, OUC (dbaez@ouc.com)
- Mr. Scott Osbourn, P.E., Golder Associates, Inc. (sosbourn@golder.com)
- Ms. Kathleen Forney, U.S. EPA, Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Heather Abrams, U.S. EPA, Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Ana Oquendo, U.S. EPA, Region 4 (oquendo.ana@epa.gov)
- Ms. Jodi Dittell, Orange County EPD (jodi.dittell@ocfl.net)
- Ms. Caroline Shine, DEP Central District (caroline.shine@dep.state.fl.us)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Orlando Utilities Commission (OUC) operates the Curtis H. Stanton Energy Center, which is an existing energy services facility (SIC No. 4911). The facility site is located 144 km southeast from the Chassahowitzka National Wildlife Area; the nearest Federal Prevention of Significant Deterioration (PSD) Class I Area.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Fossil Fuel Fired Steam Electric Generator No. 1
002	Fossil Fuel Fired Steam Electric Generator No. 2
003	Auxiliary Boiler
004	Coal Transfer Baghouse
005	Coal Crusher Building Baghouse
006	Coal Plant Transfer and Silo Fill Area #1 Baghouse
007	Coal Plant Transfer and Silo Fill Area #2 Baghouse
008	Limestone Day Bin Baghouse
009	Pebble Lime Receiving Hopper Baghouse
010	Coal Reclaim Hopper Baghouse
011	Flyash Exhauster Filter #1 Baghouse
012	Flyash Exhauster Filter #2 Baghouse
013	Flyash Exhauster Filter #3 Baghouse
014	Flyash Exhauster Filter #4 Baghouse
015	Flyash Silo Bin Vent Filter Baghouse
016	Adipic Acid Storage Baghouse
025	Stanton Unit A- Combined-Cycle Combustion Turbine
026	Stanton Unit A- Combined-Cycle Combustion Turbine
028	Distillate Fuel Oil Storage Tank
029	Flyash Silo Bin Vent Filter Baghouse
037	Stanton Unit B - 300 MW Combined Cycle Combustion Turbine
038	Stanton Unit B - Cooling Tower
039	Stanton Unit B - Distillate Fuel Oil Storage Tank
041	500 kW Emergency Generator at the Stanton A Plant Site
<i>Unregulated Emissions Units and Activities</i>	
017	Material Handling
018	Fuel Storage Tanks
019	Water Treatment
020	Unconfined Emissions

SECTION 1. GENERAL INFORMATION (DRAFT)

021	Surface Coating and Solvent Cleaning
022	General Purpose Engines
023	Helper Cooling Towers
024	Emergency Generators
027	Mechanical Draft Cooling Tower
036	Inline Insertable Dust Collector
040	Natural Draft Cooling Towers

Proposed Project

This permit reestablished the maximum heat input rates for Units 1 and 2 from 4,286 MMBtu/hour to 4,800 MMBtu/hour. The new rate will be based on a 4-hour block average and will be recognized as the permitted limit for each unit.

This project will modify the following emissions units.

Facility ID No. 0950137	
ID No.	Emission Unit Description
001	Fossil Fuel Fired Steam Electric Generator No. 1
002	Fossil Fuel Fired Steam Electric Generator No. 2

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has units subject to the acid rain provisions 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 in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, FL 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 is: Air Resources Section, 3319 Maguire Road, Suite 232, Orlando, FL 32803-3767.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms; and
 - b. Appendix B. 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: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be 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. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after 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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual NO_x, SO₂, and CO emissions for the following units: Emissions Units 001 and 002- Fossil Fuel Fired Steam Electric Generators No. 1 and No. 2.

[Application 0950137-032-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. PERMIT REVISIONS (DRAFT)

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

PERMIT BEING MODIFIED: PERMIT NO. PSD-FL-084

Affected Emissions Units: Coal Fired Boilers Units 1 and 2 (EU 001 and EU 002)

1. The proposed steam generating station shall be constructed and operated in accordance with the capabilities and specifications of the application including the ~~4,136~~ 4,800 MMBtu/hr maximum heat input rate (4-hour block average) for Unit 1 and the ~~4,286~~ 4,800 MMBtu/hr maximum heat input rate (4-hour block average) for Unit 2.

SECTION 4. APPENDICES (DRAFT)

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

CFR: Code of Federal Regulations	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscf: dry standard cubic feet	ppmv: parts per million by volume
dscfm: dry standard cubic feet per minute	ppmvd: parts per million by volume, dry basis
EPA: Environmental Protection Agency	QA: quality assurance
ESP: electrostatic precipitator (control system for reducing particulate matter)	QC: quality control
EU: emissions unit	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SIP: State Implementation Plan
gr: grains	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
HAP: hazardous air pollutant	SO₂: sulfur dioxide
Hg: mercury	TPD: tons/day
I.D.: induced draft	TPH: tons per hour
ID: identification	TPY: tons per year
kPa: kilopascals	TRS: total reduced sulfur
lb: pound	UTM: Universal Transverse Mercator coordinate system
MACT: maximum achievable technology	VE: visible emissions
MMBtu: million British thermal units	VOC: volatile organic compounds
MSDS: material safety data sheets	
MW: megawatt	

SECTION 4. APPENDIX B (DRAFT)

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 403.141, 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 403.987(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 of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B (DRAFT)

General Conditions

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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with 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 (applicable); and
 - c. Compliance with New Source Performance Standards (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 for 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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. 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 the 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.