



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

August 23, 2001

Ms. Denise M. Stalls  
Director, Environmental Affairs  
Orlando Utilities Commission  
P.O. Box 3193  
Orlando, Florida 32802

Re: Recognition of Dow Chemical's COVOL 298-1 as a Coal Dust Suppressant  
Stanton Energy Center, Facility ID #: 0950137

Dear Ms. Stalls:

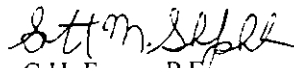
We have received your request to begin using Dow Chemical's COVOL 298-1 on your coal as a means of suppressing fugitive dust.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If OUC, or the supplier, desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product. It should be noted that this approval is only valid if the COVOL 298-1 is not applied to the coal on-site. Should you wish to apply this product to your coal on-site, a construction permit application detailing the increase in VOC/HAP emissions must first be submitted for processing.

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

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letterhead address.

Sincerely,

  
C.H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/jh

cc: Mr. Buck Oven, P.E., DEP  
Mr. Len Kozlov, P.E., DEP-CD  
Ms. Marie Driscoll, OCEPC

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

4APT-ARB

C.H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: EPA Review of the Proposed Title V Permit for  
Orlando Utilities Commission - Stanton Energy Center  
Permit Number 0950137-001-AV

Dear Mr. Fancy:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed title V permit for the Orlando Utilities Commission - Stanton Energy Center, which was posted on DEP's web site on November 12, 1999. The U.S. Environmental Protection Agency (EPA) Region 4 has completed its review of the proposed permit and believes that the State has sufficiently addressed each of the comments made by Region 4 on the draft permit. Therefore, EPA does not plan to object to this permit. Please note, however, that our opportunity for review and comment on this permit does not prevent EPA from taking enforcement action for issues that were not raised during permit review. After final issuance, this permit may be reopened if EPA or the permitting authority later determines that it must be revised or revoked to assure compliance with applicable requirements.

We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Sincerely,

R. Douglas Neeley, Chief  
Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Branch

cc: Mr. Robert F. Hicks, Orlando Utilities Commission