



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 15, 2008

Electronically Sent – Received Receipt Requested.

Mr. Jan C. Aspuru (jaspuru@ouc.com)
Vice President, Power Resources
Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida 32802

Re: DEP File No. 0950137-019-AC
Curtis H. Stanton Energy Center Units 2
Secondary Superheater Tube Replacement Project

Dear Mr. Aspuru:

Enclosed is one copy of the draft air construction permit authorizing the replacement of the secondary superheater tubes on Unit 2 at the Curtis H. Stanton Energy Center in Orange County. The Department's Intent to Issue Air Construction Permit, the Technical Evaluation, and the "Public Notice of Intent to Issue Air Construction Permit" are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, such as a newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit modification.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Jeff Koerner, New Source Review Section Administrator, at the letterhead address. If you have any questions regarding this matter, please contact Mr. Jonathan Holtom at (850) 921-9531.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk/jh

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida 32802

Project No. 0950137-019-AC
Stanton Energy Center Unit 2
Secondary Superheater Tube Replacement Project
Orange County, Florida

Authorized Representative:
Jan C. Aspuru, Vice President, Power Resources

WRITTEN NOTICE OF INTENT TO ISSUE PSD PERMIT

Facility Location: The applicant, Orlando Utilities Commission (OUC), operates the Stanton Energy Center located at 5100 Alafaya Trail, Orlando, Orange County.

Project: On January 22, 2008, OUC submitted an application requesting authorization to replace the aging secondary superheater tubes on Unit 2.

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, 62-212, 62-296 and 62-297, 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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. 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. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

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),

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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 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 postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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.

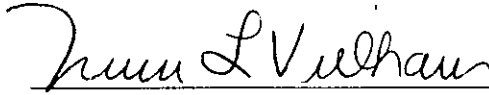
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

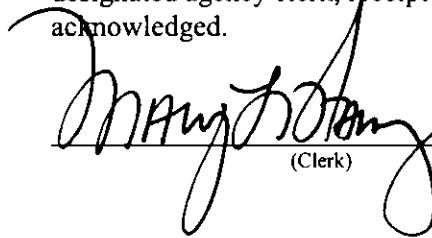
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 2/15/08 to the persons listed below.

- Jan C. Aspuru, OUC: jaspuru@ouc.com
- Denise M. Stalls, OUC: dstalls@ouc.com
- Jim Bradner, DEP CD: james.bradner@dep.state.fl.us
- Lori Cunniff, Orange County EPD: lori.cunniff@ocfl.net
- Jim Little, EPA Region 4: little.james@epamail.epa.gov
- Katy Forney, EPA Region 4: forney.kathleen@epa.gov
- Scott Osbourn, P.E., Golder Associates: sosbourn@golder.com
- Mike Halpin, DEP Siting: mike.halpin@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)

2/15/08
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit No. 0950137-019-AC
Orlando Utilities Commission, Stanton Energy Center
Orange County, Florida

Applicant: The applicant for this project is Orlando Utilities Commission. The applicant's authorized representative and mailing address is: Jan C. Aspuru, Vice President, Power Resources, Orlando Utilities Commission, Stanton Energy Center, P.O. Box 3193, Orlando, Florida 32802.

Facility and Location: The applicant, Orlando Utilities Commission (OUC), operates the Stanton Energy Center located at 5100 Alafaya Trail, Orlando, Orange County. The facility is an existing coal-fired power plant, which is identified by Standard Industrial Classification code No. 4911.

Project: On January 22, 2008, OUC submitted an application requesting authorization to replace the aging secondary superheater tubes on Unit 2.

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, 62-212, 62-296 and 62-297, 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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. 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 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/eproducts/apds/default.asp>.

Notice of Intent to Issue Air 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 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 the Public Notice. Written comments must be postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-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. 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

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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**

PROJECT

Secondary Superheater Tube Replacement Project
Draft Air Construction Permit No. 0950137-019-AC

COUNTY

Orange County

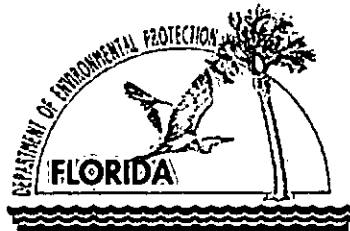
APPLICANT

Orlando Utilities Commission (OUC)
Curtis H. Stanton Energy Center Unit 2

ARMS Facility ID No. 0950137

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section



February 14, 2008

{Filename: OUC TEPD}

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

Orlando Utilities Commission - Curtis H. Stanton Energy Center Unit 2
P.O. Box 3193
Orlando, Florida 32802

Authorized Representative:

Jan C. Aspuru, Vice President, Power Resources

Processing Schedule

01/22/08 Received application for a maintenance/repair project.

Facility Description and Location

Orlando Utilities Commission operates the existing Curtis H. Stanton Energy Center, which is located at 5100 Alafaya Trail, Orlando, Orange County, Florida. This site is in an area that is currently in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

Standard Industrial Classification Code (SIC)

SIC No. 4911 – Electrical Services

Regulatory Categories

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.)

PSD: The existing facility is a major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

On January 22, 2008, OUC submitted an application requesting authorization to replace the secondary superheater tubes on Unit 2 at the Stanton Energy Center because metallurgical analyses indicate advanced and irreparable erosion.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). In general, this project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements and Federal Regulations Adopted by Reference
62-210	Required Permits, Public Notice, Reports, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- 62-213 Operation Permits for Major Sources of Air Pollution
- 62-296 Emission Limiting Standards
- 62-297 Testing, Continuous Monitoring, and Alternate Sampling Procedures

{Note: The project is not subject to Florida's Power Plant Siting Act because there will be no change in steam-generated electrical capacity.}

General PSD Applicability

The Department regulates major air pollution sources in accordance with the Prevention of Significant Deterioration (PSD) program, as delegated by the EPA for electric utilities. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standard (NAAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" 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 28 PSD Major Facility Categories, or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant". The applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility 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

In order to be subject to PSD review, a physical change or a change in a method of operation must result in a significant increase of a regulated pollutant. The replacement of the superheater tubes is not considered a modification because there are no expected increases of pollution emissions as a result of their replacement. Based on a comparison of projected to baseline actual emissions, this project is exempt from the requirements of PSD preconstruction review. Nevertheless, an air construction permit is required to conduct the proposed work.

3. APPLICATION REVIEW

Unit No. 2 consists of a coal-fueled Babcock and Wilcox boiler/steam generator (Model RB 621) and steam turbine, which drives a generator with a nameplate rating of 468 Megawatts. Fuel oil No. 6 is used for startup and flame stabilization. Biogas from a nearby landfill is also combusted. Air pollution control equipment includes an electrostatic precipitator (ESP) for particulate matter/ particulate matter 10 microns or less (PM/PM₁₀) and a scrubber for sulfur dioxide (SO₂). In addition, Unit 2 includes low nitrogen oxide (NO_x) burners (LNB), over fire air (OFA) and a selective catalytic reduction (SCR) system for NO_x control. Unit 2 is equipped with continuous monitors for opacity, stack gas flow, carbon dioxide (CO), NO_x and SO₂.

The applicant is requesting authorization to replace the corroded secondary superheater tubes in Unit 2 because metallurgical analyses indicate advanced and irreparable erosion. The new replacement tubes are characterized as functionally equivalent or a "like-kind" replacement, although the type of replacement material (SA213 TP304H) will be slightly different from the existing material and is expected to be more corrosion resistant than the existing material. The project is scheduled to begin on March 15, 2008, will

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

require about eight weeks to complete, and is estimated to cost about \$5 million.

This project is considered a “like-kind” non-routine maintenance activity that will not affect the emissions of any regulated air pollutants. The Department understands that the existing tubes are corroding beyond repair, which will eventually lead to a loss of steam and resultant electrical energy production capacity. A review of recent year’s activity and emissions shows the following:

Annual utilization summary:

Year of Operation	Heat Input (MMBtu/yr)	Generation (net MW-hrs)	Hours Operated
2003	28,477,649	2,956,008	7,261
2004	30,203,431	3,062,770	7,728
2005	32,905,551	3,405,859	7,865
2006	34,820,403	3,197,451	8,218
Highest 2-yr avg. 2005-2006	33,562,977	3,301,655	8,042

Annual criteria pollutant emissions summary:

Year of Operation	NO _x (TPY)	SO ₂ (TPY)	CO (TPY)	PM (TPY)	PM ₁₀ (TPY)	VOC (TPY)
2003	2,420	2,368	358.5	95.2	64.3	40.8
2004	2,564	2,501	371.1	112.8	112.8	44.9
2005	2,682	2,779	385.1	78.1	78.1	44.3
2006	2,855	2,640	399.7	100.0	100.0	47.3
Highest 2-yr avg. 2005-2006	2,769	2,710	392.4	89.1	89.1	45.8

From the information shown above, it is clear that there has not been a loss of combustion capacity leading up to this request. However, electrical generation capacity is starting to decrease, possibly due to a loss of steam resulting from leaking tubes. The applicant claims that the tube replacement will not result in an increase in utilization. Based on the information displayed above, it is reasonable to accept the applicant’s claim.

To provide additional assurance, the permittee shall submit an annual report to the Department demonstrating that the project did not result in any significant net emissions increase for a period of 5 years representative of normal post-change operations of the unit. For pollutants with continuous emissions monitoring systems (CEMS), CEMS data shall be used to determine emissions.

4. PRELIMINARY DETERMINATION

The Department 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.

(DRAFT)

PERMITTEE:

Orlando Utilities Commission (OUC)
P.O. Box 3193
Orlando, Florida 32802

Authorized Representative:

Jan C. Aspuru, Vice President, Power Resources

Permit No. 0950137-019-AC Curtis H. Stanton Energy Center Stanton Unit 2 SIC No. 4911 Secondary Superheater Tube Replacement Project Orange County, Florida Permit Expires: March 31, 2009
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PROJECT AND LOCATION

This permit authorizes the replacement of the secondary superheater tubes on Unit 2 at the OUC Curtis H. Stanton Energy Center. The facility is located at 5100 Alafaya Trail, Orlando, Orange County.

STATEMENT OF BASIS

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.) and Title 40, Part 60 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Florida Department of Environmental Protection (the Department).

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendix GC

Joseph Kahn, Director
Division of Air Resource Management

(Date)

JK/tlv/jfk/jh

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of two 468 megawatt (MW) fossil fuel fired steam electric generating units (Units 1 and 2), and one 640 MW combined cycle unit. There are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash.

As noted above, the project under this permit is for the replacement of the secondary superheater tubes on Unit 2. The tubes are being repaired and replaced because metallurgical analyses indicate advanced and irreparable erosion. The new replacement tubes are characterized as functionally equivalent or a "like-kind" replacement, although the type of replacement material (SA213 TP304H) will be slightly different from the existing material and is expected to be more corrosion resistant than the existing material. The project is scheduled to begin on March 15, 2008, will require about 8 weeks to complete, and is estimated to cost about \$5 million.

EU ID	Emissions Unit Description
002	Fossil Fuel Fired Steam Electric Generator No. 2

REGULATORY CLASSIFICATION

The facility is a potential major source of hazardous air pollutants (HAP).

The facility operates existing units subject to the Acid Rain provisions of Title IV of the Clean Air Act (CAA).

The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

The facility is a major Prevention of Significant Deterioration (PSD) stationary source in accordance with Rule 62-212.400, F.A.C.

The facility operates units subject to the Standards of Performance for New Stationary Sources pursuant to 40 CFR Part 60.

The facility is subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by the Department in Rule 62-296.470, F.A.C.

The facility is subject to the Federal Clean Air Mercury Rule (CAMR) implemented by the Department in Rule 62-296.480, F.A.C.

The facility operates units that were certified under the Florida Power Plant Siting Act, 403.501-518, F.S.

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and the Department's Technical Evaluation and Preliminary Determination.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 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 are: Department of Environmental Protection, Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando Florida 32803-3767. Telephone: (407) 894-7555. Fax: (407) 897-5963.
3. Appendices: The following Appendix is attached as part of this permit: Appendix GC (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, 62-214, 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: No emissions unit shall be constructed or 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. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and 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 application shall be submitted to the Bureau of Air Regulation with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

This section of the permit addresses the following existing emissions unit.

Emissions Unit 002

Fossil Fuel Fired Steam Generator 2 is a wall-fired, dry bottom boiler, firing pulverized coal as the primary fuel and No. 6 fuel oil for purposes of startup and flame stabilization. The unit has a maximum heat input rate of 4,286 million British thermal units (MMBtu) per hour with a nominal generating capacity of 468 MW. The unit is equipped with an electrostatic precipitator (ESP) for control of particulate matter (PM/PM₁₀), a wet flue gas desulfurization (WFGD) system for sulfur dioxide (SO₂) control, and low NO_x burners for nitrogen oxides (NO_x) control. Unit 2 is also equipped with a selective catalytic reduction (SCR) system for further control of NO_x emissions. The following parameters are continuously monitored: NO_x, opacity, SO₂, carbon dioxide (CO₂), and stack gas flow rate.

APPLICABLE STANDARDS AND REGULATIONS

1. Applicable Requirements: Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. The requirements of this permit are in addition to all other applicable requirements. [Rule 62-210.300, F.A.C.]

GENERAL OPERATION REQUIREMENTS

2. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4), F.A.C.]
3. Source Obligation: 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)(c), F.A.C.]

AUTHORIZED REPAIRS AND REPLACEMENT

4. Secondary Superheater Tubes: The permittee is authorized to repair/replace the secondary superheater tubes for Unit 2, as described in the application. The new replacement tubes are characterized as functionally equivalent or a "like-kind" replacement, although the type of replacement material will be slightly different from the existing material and is expected to be more corrosion resistant than the existing material. This permit only authorizes the repair/replacement of the secondary superheater tubes and does not authorize any increases in allowable heat input or allowable pollutant emissions rates.
[Applicant Request.]

REPORTING AND NOTIFICATION REQUIREMENTS

5. Notification: Within one week of commencing the secondary superheater tube replacement project, the permittee shall notify the Compliance Authority that the project has commenced and provide a general schedule of construction activities. Within one week following the end of construction, the permittee shall notify the Compliance Authority that the project was completed.
[Rule 62-4.210, F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

6. PSD Applicability Monitoring and Reporting Requirements:

- a. The permittee shall monitor the emissions of NO_x, SO₂, CO, PM, SAM, lead and VOC; 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 5 years from the issuance date of this permit. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.
- b. The permittee shall report to the Department within 60 days after the end of each year during which records must be generated under subparagraph 62-212.300(1)(e)1., F.A.C., 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 subparagraph 62-212.300(1)(e)1., F.A.C.;
 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.

[Rule 62-212.300(1)(e), F.A.C.]

7. Computation of Emissions: The owner or operator shall compute emissions in accordance with the requirements set forth below:

- a. Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 1. If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 2. If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 3. If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- b. Continuous Emissions Monitoring System (CEMS).
 1. An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or

- (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 2. Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - (a) A calibrated flowmeter that records data on a continuous basis, if available; or
 - (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 3. The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other 63 necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- c. Mass Balance Calculations.
1. An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - (a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - (b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 2. Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 3. In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- d. Emission Factors.
1. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - a. If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - b. Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - c. The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

2. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- e. Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- f. Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- g. Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- h. Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

SECTION 4. APPENDIX GC – GENERAL CONDITIONS (DRAFT)

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 403.161, 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 403.087(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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does 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 or 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 a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the 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 non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

SECTION 4. APPENDIX GC – GENERAL CONDITIONS (DRAFT)

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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
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.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code 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 (Not Applicable);
 - c. Compliance with New Source Performance Standards (Not 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 or 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:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.

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 that 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.

PROFESSIONAL ENGINEER CERTIFICATION STATEMENT

PERMITTEE

Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida 32802

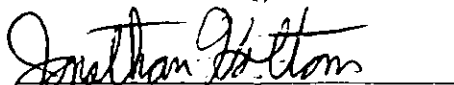
Draft Air Permit No. 0950137-019-AC
Stanton Energy Center Unit 2
Secondary Superheater Tube Replacement Project
Orange County, Florida

PROJECT DESCRIPTION

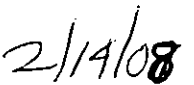
Project: On January 22, 2008, OUC submitted an application requesting authorization to replace the aging secondary superheater tubes on Unit 2. The tubes are being repaired and replaced because metallurgical analyses indicate advanced and irreparable erosion. The new replacement tubes are characterized as functionally equivalent or a "like-kind" replacement, although the type of replacement material (SA213 TP304H) will be slightly different from the existing material and is expected to be more corrosion resistant than the existing material. The project is scheduled to begin on March 15, 2008, will require about 8 weeks to complete, and is estimated to cost about \$5 million.

The existing facility consists of two 468 megawatt (MW) fossil fuel fired steam electric generating units (Units 1 and 2), and one 640 MW combined cycle unit. There are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash.

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 aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jonathan Holtom, P.E.
Registration Number: 52664



(Date)

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer
THRU: Jeff Koerner *JK*
FROM: Jonathan Holtom *JH*
DATE: February 14, 2008
SUBJECT: Orlando Utilities Commission (OUC) – Stanton Energy Center
Unit 2 Secondary Superheater Replacement Project
DEP File No. 0950137-019-AC

Attached is the Intent to Issue package for the replacement of the secondary superheater tubes on OUC Stanton Unit 2.

The existing tubes are corroding beyond repair and need to be replaced in order to avoid loss of steam and electrical production capacity. No pollutant increases are expected as a result of this non-routine maintenance activity, but PSD non-applicability reports will be required for the next five years.

I recommend your approval of the attached Intent to Issue.

Attachments

Harvey, Mary

From: Harvey, Mary
Sent: Friday, February 15, 2008 11:24 AM
To: 'Jan C. Aspuru, OUC:'; 'Denise M. Stalls, OUC:'; Bradner, James; 'Lori Cuniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'; 'Scott Osbourn, P.E., Golder Associates:'; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE:No. 0950137.019.AC.DRAFT - Orlando Utilities Commission (OUC)
Attachments: 0950137.019.AC.D.pdf.zip

Tracking:	Recipient	Delivery	Read
<input checked="" type="checkbox"/>	Jan C. Aspuru, OUC:		
<input checked="" type="checkbox"/>	Denise M. Stalls, OUC:		
<input checked="" type="checkbox"/>	Bradner, James	Delivered: 2/15/2008 11:24 AM	Read: 2/15/2008 12:57 PM
<input checked="" type="checkbox"/>	Lori Cuniff, Orange County EPD:		
<input checked="" type="checkbox"/>	Jim Little, EPA Region 4:		
<input checked="" type="checkbox"/>	Katy Forney, EPA Region 4:		
<input checked="" type="checkbox"/>	Scott Osbourn, P.E., Golder Associates:		
<input checked="" type="checkbox"/>	Halpin, Mike	Delivered: 2/15/2008 11:24 AM	Read: 2/15/2008 11:31 AM
<input checked="" type="checkbox"/>	Holtom, Jonathan	Delivered: 2/15/2008 11:24 AM	Read: 2/15/2008 11:26 AM
<input checked="" type="checkbox"/>	Walker, Elizabeth (AIR)	Delivered: 2/15/2008 11:24 AM	
<input checked="" type="checkbox"/>	Gibson, Victoria	Delivered: 2/15/2008 11:24 AM	Read: 2/15/2008 11:25 AM

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Delivered: 2/15/2008 11:24 AM Read: 2/15/2008 12:57 PM

The 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>.

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Thank you,

DEP, Bureau of Air Regulation

2/20/2008

Harvey, Mary

From: ~~Stalls, Denise M.~~ [DStalls@ouc.com]
Sent: Friday, February 15, 2008 11:33 AM
To: Harvey, Mary
Subject: RE: DEP FILE No: 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

received

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, February 15, 2008 11:24 AM
To: Aspuru, Jan; Stalls, Denise M.; Bradner, James; Lori Cunniff, Orange County EPD;; Jim Little, EPA Region 4;; Katy Forney, EPA Region 4;; Scott Osbourn, P.E., Golder Associates;; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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 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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole 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.

Harvey, Mary

From: Osbourn, Scott [Scott_Osbourn@golder.com]
To: undisclosed-recipients
Sent: Friday, February 15, 2008 12:08 PM
Subject: Read: DEP FILE No:0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

Your message

To: Scott_Osbourn@golder.com
Subject:

was read on 2/15/2008 12:08 PM.

Harvey, Mary

From: ~~Bradner, James~~
To: Harvey, Mary
Sent: Friday, February 15, 2008 12:58 PM
Subject: Read: DEP FILE No. 0950137-019-AC:DRAFT - Orlando Utilities Commission (OUC)

Your message

To: 'Jan C. Aspuru, OUC:'; 'Denise M. Stalls, OUC:'; Bradner, James; 'Lori Cunniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'; 'Scott Osbourn, P.E., Golder Associates:'; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)
Sent: 2/15/2008 11:24 AM

was read on 2/15/2008 12:57 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, February 19, 2008 9:29 AM
To: Harvey, Mary
Subject: Re: FW: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30303

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

02/15/2008 11:25
AM

To
Kathleen Forney/R4/USEPA/US@EPA
cc
Subject

FW: DEP FILE No.
0950137-019-AC-DRAFT - Orlando
Utilities Commission (OUC)

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Friday, February 15, 2008 11:24 AM
To: 'Jan C. Aspuru, OUC: '; 'Denise M. Stalls, OUC: '; Bradner, James; 'Lori Cunniff, Orange County EPD: '; 'Jim Little, EPA Region 4: '; 'Katy Forney, EPA Region 4: '; 'Scott Osbourn, P.E., Golder Associates: '; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

Dear Sir/Madam:

Harvey, Mary

From: Halpin, Mike
To: Harvey, Mary
Sent: Friday, February 15, 2008 11:31 AM
Subject: Read: DEP FILE No: 0950137-019-AC-DRAFT - Orlando-Utilities Commission (OUC)

Your message

To: 'Jan C. Aspuru, OUC:; 'Denise M. Stalls, OUC:; Bradner, James; 'Lori Cunniff, Orange County EPD:; 'Jim Little, EPA Region 4:; 'Katy Forney, EPA Region 4:; 'Scott Osbourn, P.E., Golder Associates:; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)
Sent: 2/15/2008 11:24 AM

was read on 2/15/2008 11:31 AM.

Harvey, Mary

From: Holtom, Jonathan
To: Harvey, Mary
Sent: Friday, February 15, 2008 11:26 AM
Subject: Read: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

Your message

To: 'Jan C. Aspuru, OUC:>'; 'Denise M. Stalls, OUC:>'; Bradner, James; 'Lori Cunniff, Orange County EPD:>'; 'Jim Little, EPA Region 4:>'; 'Katy Forney, EPA Region 4:>'; 'Scott Osbourn, P.E., Golder Associates:>'; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)
Sent: 2/15/2008 11:24 AM

was read on 2/15/2008 11:26 AM.

Harvey, Mary

From: Aspuru, Jan. [JAspuru@ouc.com]
To: undisclosed-recipients
Sent: Friday, February 15, 2008 5:33 PM
Subject: Read: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

Your message

To: JAspuru@ouc.com
Subject:

was read on 2/15/2008 5:33 PM.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Friday, February 15, 2008 11:25 AM
Subject: ~~Read: DEP FILE No: 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)~~

Your message

To: 'Jan C. Aspuru, OUC:'; 'Denise M. Stalls, OUC:'; Bradner, James; 'Lori Cunniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'; 'Scott Osbourn, P.E., Golder Associates:'; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)
Sent: 2/15/2008 11:24 AM

was read on 2/15/2008 11:25 AM.

Harvey, Mary

From: ~~Lori.Cunniff@ocfl.net~~
Sent: Friday, February 15, 2008 5:09 PM
To: Harvey, Mary
Subject: ~~RE: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)~~

Rec'd

Lori Cunniff, Manager
Orange County Environmental Protection Division
800 Mercy Drive
Orlando, FL 32808
407-836-1405

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From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, February 15, 2008 11:24 AM
To: Jan C. Aspuru, OUC;; Denise M. Stalls, OUC;; Bradner, James; Cunniff, Lori; Jim Little, EPA Region 4;; Katy Forney, EPA Region 4;; Scott Osbourn, P.E., Golder Associates;; Halpin, Mike
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: DEP FILE No. 0950137-019-AC-DRAFT - Orlando Utilities Commission (OUC)

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2/18/2008

Harvey, Mary

From: Lori.Cunniff@ocfl.net
To: undisclosed-recipients
Sent: Friday, February 15, 2008 5:07 PM
Subject: Read: DEP FILE No. 0950137-019-AC-DRAFT- Orlando Utilities Commission (OUC)

Your message

To: Lori.Cunniff@ocfl.net
Subject:

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