

# Florida Department of Environmental Protection

## Memorandum

To: Joseph Kahn, Division of Air Resource Management  
Through: Trina Vielhauer, Bureau Air Resources *aez for TL ✓*  
Through: Al Linero, Special Projects Section *aez*  
From: David L. Read, Special Projects Section *DLR*  
Date: December 28, 2009  
Subject: Final Minor Source Air Construction Permit  
Project No. 0950137-028-AC  
Orlando Utilities Commission (OUC), Curtis H. Stanton Energy Center  
Temporary Test of Coal Additives

Attached for your review is the final minor air construction permit package, which authorizes a temporary test using fuel additives in the coal-fueled Units 1 and 2 at the OUC Curtis H. Stanton Energy Center. This authorization is for a test of no more than 90 days duration to determine whether a particular coal additive strategy reduces NO<sub>x</sub> emissions from Units 1 and 2. This test burn will also allow operational issues when using the additive to be assessed. If successful, OUC will submit another application along with the test report to permanently use the additives in Units 1 and 2.

The Department distributed an "Intent to Issue Permit" package on December 10, 2009. The applicant published the "Public Notice of Intent to Issue" in the Orlando Sentinel on December 11, 2009. Several minor comments were received from the applicant, which are addressed in the final determination. No comments were received from the public at large or any agencies concerning the intent package. Minor changes were made to the draft air construction permit related to the notifications required prior to additive application and emissions testing. Also a change was made to indicate that two 475 ton per hour (tph) coal and additive mixers will be utilized during the project instead of one 950 tph unit.

We recommend your approval of the attached final permit package.

Attachments

AL/dlr

## **FINAL DETERMINATION**

Air Construction Permit  
Orlando Utilities Commission (OUC)  
Curtis H. Stanton Energy Center  
Temporary Test of Coal Additives in Units 1 and 2  
DEP File No. 0950137-028-AC

### **PERMITTEE**

Orlando Utilities Commission (OUC)  
500 South Orange Avenue  
Post Office Box 3193  
Orlando, Florida 32802

### **PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Special Projects Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida, 32399-2400

### **PROJECT**

Air Permit No. 0950137-028-AC  
Temporary Test of Coal Additives in Units 1 and 2

This permit authorizes a temporary test using additives in the coal-fueled Units 1 and 2 at the OUC Curtis H. Stanton Energy Center. This authorization is for a test of no more than 90 days duration to determine whether a particular coal additive strategy reduces NO<sub>x</sub> emissions from Units 1 and 2. This test burn will also allow operational issues when using the additive to be assessed. If successful, OUC will submit another application along with the test report to permanently use the additives in Units 1 and 2. The project is not subject to PSD preconstruction review.

### **NOTICE AND PUBLICATION**

The Department distributed an "Intent to Issue Permit" package on December 10<sup>th</sup>, 2009. The applicant published the "Public Notice of Intent to Issue" in the Orlando Sentinel on December 11<sup>th</sup>, 2009.

### **COMMENTS**

No comments on the "Intent to Issue Permit" package were received from the public or any agencies. The applicant submitted minor comments by electronic mail on December 17<sup>th</sup>, 2009 and by phone on December 21<sup>st</sup>, 2009. Following are the comments from OUC and the Department responses:

OUC Comment 1. Re: Condition 5. Fuel Additive Application. *"Given the critical timeframe constraints, OUC proposes that the Department consider these comments sufficient notification that the application of the additive will start as soon as the permit becomes effective."*

Department response: Based on discussions with the Department's Central District, the Department agrees that sufficient notification has been provided. The start of the fuel additive application process is scheduled to begin December 28<sup>th</sup>, 2009.

OUC Comment 2: Re: Condition 8. Compliance Authority Test Schedule Notification: *“Given the critical timeframe constraints, OUC intends to apply the additive to the coal as soon as the permit is effective. OUC proposes that the department waive this requirement for the test burns between December 28, 2010 and January 1<sup>st</sup> 2010.”*

Department response: Since submission of the comment, OUC submitted a schedule for the additive application that will occur between December 28<sup>th</sup>, 2009 and January 1<sup>st</sup>, 2010 pending issuance of a final permit. Further details regarding additive application schedules will be submitted in advance of particulate testing planned during the week of January 18<sup>th</sup> to 22<sup>nd</sup>, 2010. Based on discussions with the Department’s Central District, the Department agrees that sufficient information has been provided regarding the additive application during December 28<sup>th</sup> through January 1<sup>st</sup> test period.

OUC Comment 3: Re: Condition 9. Standard Baseline Emissions: *“OUC proposes to use the data collected during the 2009 annual compliance tests for both units 1 and 2 to satisfy this condition requiring baseline emissions. While both units have CEMs for NO<sub>x</sub>, CO, and SO<sub>2</sub> and COMS for visual emissions, an EPA test method 5 would require the hiring of a qualified vendor in very short notice.”*

Department response: The Department reviewed the data for the particulate testing conducted during 2009. The values were nearly one order of magnitude less than allowed by the permit and are adequate for the purposes of establishing a baseline. There are continuous emissions monitoring systems (CEMS) for NO<sub>x</sub>, CO and SO<sub>2</sub> emissions and a continuous opacity monitor (COM) for VE that will provide a complete record of baseline emissions for pollutants of interest.

OUC Comment 4: Re: Condition 11. Emissions with Coal Additive: Given the critical timeframe constraints, OUC intends to apply the additive to the coal as soon as the permit is effective. OUC proposes that the department waive this requirement for the test burns between December 28<sup>th</sup>, 2010 and January 1<sup>st</sup> 2010. While both units have CEMS for NO<sub>x</sub>, CO, and SO<sub>2</sub> and COMS for visual emissions, an EPA test method 5 would require the hiring of a qualified vendor in very short notice.

Department response: The Department agrees to allow the PM testing schedule to take place sometime during the week of January 18<sup>th</sup> to January 22<sup>th</sup>, 2010 to be used to satisfy the PM testing requirement of **Permit Condition 11** once the fuel additive has been applied to the coal. However, if and when, different application rates of the fuel additive to the coal takes place, additional PM testing will be required for each new application rate.

OUC Comment 5: Re: Condition 3. Chem-Mod™ Solution Processing Systems: OUC commented by phone on December 21<sup>st</sup>, 2009 that Condition 3 of the permit specified one 950 ton per hour (tph) mixer to mix the coal with the fuel additive, when actually two 475 tph mixers will be used. OUC requested that the permit condition be modified to account for this change.

Department response: The Department will change Condition 3 to reflect that two 475 tph mixers will be used during the project instead of one 950 tph mixer.

## CONCLUSION

The final action of the Department is to issue the permit with the changes described above.



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blainstone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor  
Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

## PERMITTEE

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

Authorized Representative:  
Mr. Jan C. Aspuru, Vice President  
of Power Generation

Air Permit No. 0950137-028-AC  
Permit Expires: June 30, 2010  
Minor Air Construction Permit  
Stanton Energy Center

Temporary Short-Term Test Burn of  
Chem-Mod™ Fuel (Coal) Additive

## PROJECT

OUC operates an existing power plant called the Curtis H. Stanton Energy Center (Stanton), which is categorized under Standard Industrial Classification (SIC) as No. 4911. The existing facility is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. The UTM coordinates are: Zone 17, 483.6 km East and 3151.1 km North.

This is the final air construction permit, which authorizes a test of a two part fuel chemical additive called Chem-Mod™ Solution at Stanton Units No. 1 and 2. This authorization is only for a test lasting no more than ninety (90) days in duration to determine whether this fuel additive reduces emissions of nitrogen oxides (NO<sub>x</sub>) from Units No. 1 and 2. This test will also allow operational issues when using the fuel additive to be assessed.


This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). 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. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

## 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.). 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

  
\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

12/28/09  
(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 with Appendices) 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 12/28/09 to the persons listed below.

- Jan C. Aspuru, OUC: [jaspuru@ouc.com](mailto:jaspuru@ouc.com)
- Denise Stalls, OUC: [dstalls@ouc.com](mailto:dstalls@ouc.com)
- Scott Osbourn, P.E., Golder Associates: [scott\\_osbourn@golder.com](mailto:scott_osbourn@golder.com)
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- Lori Cunniff, Orange County EPD: [lori.cunniff@ocfl.net](mailto:lori.cunniff@ocfl.net)
- Jodi Dittel, Orange County EPD: [jodi.dittell@ocfl.net](mailto:jodi.dittell@ocfl.net)
- Vickie Gibson, DEP BAR Reading File: [victoria.gibson@dep.state.fl.us](mailto: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)

12/28/09  
(Date)

## SECTION 1. GENERAL INFORMATION

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### FACILITY DESCRIPTION

The existing Stanton Energy Center (Stanton) consists of two 468 megawatts (MW) coal-fuel units (Units No. 1 and 2) and one 640 MW natural gas-fired combined cycle (NGCC) unit (Unit A). There are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash. A recently permitted nominal 300 MW NGCC unit (Unit B) should be operational by the year 2012.

### PROPOSED PROJECT

This project involves the test burning of a fuel additive in Units No. 1 and 2 at the Stanton. The fuel additive, referred to as the Chem-Mod™ Solution, is a dual injection sorbent system in which two chemicals are injected on the coal feed belt, before the coal combustion process, to reduce the resulting combustion emissions. The two additives are referred to as MerSorb and S-Sorb. The proposed test requires additional material handling system for the additives, as well as a diesel generator to supply electrical power to the new systems.

### FACILITY 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 213, F.A.C.
- The facility is a major stationary source (Prevention of Significant Deterioration (PSD) major source) in accordance with Rule 62-212.400, F.A.C.
- The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, Florida Administrative Code (F.A.C.).
- The facility operates units subject to the Standards of Performance for New Stationary Sources (NSPS) pursuant to 40 CFR Part 60.
- The facility operates units that were certified under the Florida Power Plant Siting Act, 403.501-518, F.S.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. **Permitting Authority:** All documents related to PSD applications for permits to construct or modify emissions units shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to construct minor sources of air pollution or to operate the facility shall be submitted to the Air Resources Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, FL 32803-3767.
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 Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); and Appendix C (Common 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. **Unconfined Emissions of Particulate Matter:** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter. Reasonable precautions include the following: a) Paving and maintenance of roads, parking areas and yards; b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing; c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; d) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne; e) Landscaping or planting of vegetation; f) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter; g) Confining abrasive blasting where possible; and, h.) Enclosure or covering of conveyor systems. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice. [Rule 62-296.320(4)(c), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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8. **Objectionable Odors Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C. and Rule 62-4.070, F.A.C. Reasonable Assurance]  
*{Permitting Note: An objectionable odor is defined in Rule 62-210.200(Definitions), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.}*
9. **General Visible Emissions (VE) Standard:**
- a. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
  - b. Notwithstanding subparagraph 62-296.320(4)(b)1., F.A.C., above, the owner or operator of an emissions unit subject to the general visible emission standard may request the Department to establish a higher visible emissions standard for that emissions unit. The owner or operator may request that a visible emissions standard be established at that level at which the emissions unit will be able, as indicated by compliance tests, to meet the opacity standard at all times during which the emissions unit is meeting the applicable particulate matter standard. The Department shall establish such a standard, through the permitting process, if it finds that:
    - (i.) The emissions unit was in compliance with the applicable particulate emission standard while a compliance test was being conducted but failed to comply with the general visible emissions standard during the test;
    - (ii.) The emissions unit and associated air pollution control equipment were operated and maintained in a manner to minimize the opacity emissions during the compliance test; and
    - (iii.) The emissions unit and associated air pollution control equipment were incapable of being adjusted or operated in such a manner as to meet the opacity standard.
    - (iv.) If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this rule, such failure shall not be a violation of this rule.
- [Rule 62-296.320(4)(b) F.A.C, General Visible Emissions Standard]



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Coal-Fuel Fired Units No. 1 and 2

This section of the permit addresses the following emissions unit.

EU ID No.	Emission Unit Description
001	Coal-Fuel Fired Unit No. 1
002	Coal-Fuel Fired Unit No. 2

#### COMPLIANCE WITH EXISTING PERMIT CONDITIONS

1. Existing Permits: This permit supplements all existing valid permits. The permittee shall continue to comply with all applicable conditions from valid air construction and Title V operation permits.  
[Application No. 0950137-028-AC and Rule 62-4.070(3), F.A.C.]

#### TEMPORARY EQUIPMENT

2. Electrical Generator: The permittee is authorized to temporarily install and operate a Caterpillar™ or similar 500 kilowatt (kW) diesel electrical generator. The generator must meet all applicable requirements of NSPS 40 CFR 60, Subpart IIII for Stationary Compression Ignition Internal Combustion Engines and NESHAP 40 CFR 63 for Stationary Reciprocating Internal Combustion Engines (RICE).  
[Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C., and Rule 62-4.070(3), F.A.C.]
3. Chem-Mod™ Solution Processing Systems: The permittee is authorized to temporarily install the delivery, conveyance, storage and spray systems associated with applying the Chem-Mod™ Solution fuel additive to the coal on the coal feed belts prior to the combustion processes in Units No. 1 and 2. These Chem-Mod™ processing systems must meet the reasonable requirements to minimize unconfined emissions of particulate matter (PM) and the VE standards specified in **Conditions 7 and 9 of Section II** of this permit, respectively. This equipment consists of the following:
  - For the Mersorb component of the Chem-Mod™ Solution fuel additive: a storage tank filled by tanker trucks, a day storage tank, a feed pump and application spray nozzles;
  - For the S-Sorb component of the Chem-Mod™ Solution fuel additive: a storage silo with a bin filter filled by tanker trucks; three (3) transfer screws and a day storage silo; and,
  - To mix the coal once the Chem-Mod™ Solution fuel additive has been applied, two 475 ton per hour (tph) mixers will be used during the project.[Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C., and Rule 62-4.070(3), F.A.C.]

#### PERFORMANCE RESTRICTIONS

4. Chem-Mod™ Solution Fuel Additive: For Units No. 1 and 2, the permittee is temporarily authorized to apply the fuel additive Chem-Mod™ Solution to the currently authorized coal blends (bituminous coal). The maximum application rate for the fuel additive is 7.65 tph.  
[Application No. 0950137-028-AC and Rule 62-210.200(PTE), F.A.C.]
5. Fuel Additive Application: The fuel additive shall only be applied to coal that will be fired in Units No. 1 or No. 2. The Compliance Authority shall be given at least ten (10) days notice before the application of the coal additive begins and notified immediately after final application of additive.  
[Application No. 0950137-028-AC and Rule 62-4.070(3), F.A.C.]
6. Test Duration: The permittee shall complete the test within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal.  
[Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Coal-Fuel Fired Units No. 1 and 2

7. Restricted Fuel Additive Application: Unless written permission is given by the Department, no more than 16,000 tons of the additive shall be applied to the coal used in Units No. 1 and 2 during the test period. [Rule 62-4.070(3), F.A.C. and Rule 62-210.200(PTE), F.A.C.]

#### TEST SCHEDULE

8. Compliance Authority Test Schedule Notification: Prior to the application of the fuel additive, the permittee shall provide to the Compliance Authority in writing a test schedule. At a minimum the schedule shall include the test dates for each trial burn, the amount of the additive to be applied to the coal for each planned trial burn, the planned duration of each trial burn and the air emission tests that will be conducted during each trial burn (stack test or Continuous Emission Monitor (CEM) data). Any trial burn that results in the exceedance of emission limits specified in any valid air construction and Title V operation permits (see **Condition 1 of this subsection**) shall cease operation as soon as possible, but in no circumstances shall more than 4 hours pass before operations cease. [Rule 62-4.070(3), F.A.C. and Rule 62-210.200(PTE), F.A.C.]

#### MONITORING REQUIREMENTS

9. Standard Baseline Emissions: Baseline emissions shall be determined by CEMS for NO<sub>x</sub>, CO and SO<sub>2</sub> emission and a continuous opacity monitor (COM) for VE, when firing representative coal fuel blends at permitted capacity in each unit prior to using the fuel additive. For each unit that will fire coal with the coal additive, the permittee shall conduct EPA Method 5 PM emissions tests. Test results shall be reported in units of lb/mmBtu and lb/hour. [Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]
10. Baseline Ammonia Injection Rate: For Unit No. 2, the ammonia injection rate used in the selective catalytic reduction (SCR) system when baseline NO<sub>x</sub> emission are determined shall be recorded by a flow meter in gallons per hour (gal/hr). [Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]
11. Emissions with Coal Additive: Emissions shall be determined by the CEMS for NO<sub>x</sub>, CO and SO<sub>2</sub> emissions and for VE by COM when firing coal blends with the additive at the permitted capacity for each unit. For each unit when it fires coal with the additive, the permittee shall conduct EPA Method 5 PM emissions tests. Test results shall be reported in units of lb/mmBtu and lb/hour. [Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]
12. Ammonia Injection Rate with Coal Additive: For Unit No. 2, the ammonia injection rate used in the selective catalytic reduction (SCR) system when NO<sub>x</sub> emission are determined when coal with the additive is fired in the unit shall be recorded by a flow meter in gallons per hour (gal/hr). [Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]
13. Monitoring of Operations: For each trial test burn in each unit, the permittee shall conduct the following monitoring: the type, amount, and heat input of coal fired; flue gas oxygen levels and electrical outputs; the fuel additive injection rates and fuel additive concentrations; loss of ignition (LOI) of the fly ash in the PM control device; and continuously monitor and record NO<sub>x</sub>, CO and SO<sub>2</sub> and VE (opacity), with the existing CEMS and COM, and for Unit No. 2 the ammonia injection rate into the SCR system in gal/hr. For comparison purposes, the permittee shall identify the current corresponding baseline monitoring values for bituminous coal firing or collect baseline data during the trial burn period. [Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. Coal-Fuel Fired Units No. 1 and 2

14. Notifications: The permittee shall provide the Compliance Authority with a written preliminary schedule for conducting any emissions tests (by letter, fax, or email). The preliminary schedule shall be updated as necessary. The permittee shall provide the Compliance Authority with at least 15 days advance notice (by phone, fax, or email) prior to conducting any particulate emission tests.  
[Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]
15. Fly Ash Sampling Plan: OUC shall submit a fly ash sampling plan to the Bureau of Air Regulation prior to the commencement of the PM testing. The sampling plan shall specify the manner by which fly ash samples will be collected to insure they correspond to specific rates of additive application. The samples collected shall be labeled with the date and the test conditions including the additive application rate and submitted to the Bureau of Air Regulation. [Rule 62-4.070(3), F.A.C.]

#### RECORDS AND REPORTS

16. Test Report: Within 60 days of completing all test burns, the permittee shall submit a final report summarizing all test burns to the Bureau of Air Regulation and the Compliance Authority. The final report shall provide the following: the actual schedule and overall description of each trial test burn; any operational issues related to the coal additive; a comparison of baseline operation versus operation with the coal additive; an evaluation of equipment compatibility with coal additive; a summary and comparison of continuous emissions, VE (opacity) and ammonia monitoring data; a summary and comparison of the specified operational parameters; a summary and comparison of emissions test results; a comparison of continuously monitored emissions; a discussion of the impacts on LOI; and a discussion of emissions as described in Appendix C of 40 CFR 60. [Rules 62-4.070(3), 62-210.200(PTE) and 62-212.400, F.A.C.]

**SECTION 4. APPENDICES**

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Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

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#### 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

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

<b>ARMS:</b> Air Resource Management System (Department's database)	<b>kPa:</b> kilopascals
<b>BACT:</b> best available control technology	<b>lb:</b> pound
<b>bhp:</b> brake horsepower	<b>MACT:</b> maximum achievable technology
<b>Btu:</b> British thermal units	<b>MMBtu:</b> million British thermal units
<b>CAM:</b> compliance assurance monitoring	<b>MSDS:</b> material safety data sheets
<b>CEMS:</b> continuous emissions monitoring system	<b>MW:</b> megawatt
<b>cfm:</b> cubic feet per minute	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CFR:</b> Code of Federal Regulations	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CAA:</b> Clean Air Act	<b>NSPS:</b> New Source Performance Standards
<b>CMS:</b> continuous monitoring system	<b>O&amp;M:</b> operation and maintenance
<b>CO:</b> carbon monoxide	<b>O<sub>2</sub>:</b> oxygen
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>Pb:</b> lead
<b>COMS:</b> continuous opacity monitoring system	<b>PM:</b> particulate matter
<b>DARM:</b> Division of Air Resource Management	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>DEP:</b> Department of Environmental Protection	<b>ppm:</b> parts per million
<b>Department:</b> Department of Environmental Protection	<b>ppmv:</b> parts per million by volume
<b>dscf:</b> dry standard cubic feet	<b>ppmvd:</b> parts per million by volume, dry basis
<b>dscfm:</b> dry standard cubic feet per minute	<b>QA:</b> quality assurance
<b>EPA:</b> Environmental Protection Agency	<b>QC:</b> quality control
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>PSD:</b> prevention of significant deterioration
<b>EU:</b> emissions unit	<b>psi:</b> pounds per square inch
<b>Fl:</b> fluoride	<b>PTE:</b> potential to emit
<b>F.A.C.:</b> Florida Administrative Code	<b>RACT:</b> reasonably available control technology
<b>F.A.W.:</b> Florida Administrative Weekly	<b>RATA:</b> relative accuracy test audit
<b>F.D.:</b> forced draft	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>F.S.:</b> Florida Statutes	<b>SAM:</b> sulfuric acid mist
<b>FGD:</b> flue gas desulfurization	<b>scf:</b> standard cubic feet
<b>FGR:</b> flue gas recirculation	<b>scfm:</b> standard cubic feet per minute
<b>ft<sup>2</sup>:</b> square feet	<b>SIC:</b> standard industrial classification code
<b>ft<sup>3</sup>:</b> cubic feet	<b>SIP:</b> State Implementation Plan
<b>gpm:</b> gallons per minute	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>gr:</b> grains	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>HAP:</b> hazardous air pollutant	<b>TPD:</b> tons/day
<b>Hg:</b> mercury	<b>TPH:</b> tons per hour
<b>I.D.:</b> induced draft	<b>TPY:</b> tons per year
<b>ID:</b> identification	<b>TRS:</b> total reduced sulfur
	<b>UTM:</b> Universal Transverse Mercator coordinate system
	<b>VE:</b> visible emissions
	<b>VOC:</b> volatile organic compounds

## SECTION 4. APPENDIX B

### 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

## SECTION 4. APPENDIX B

### General Conditions

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.
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 (not applicable); and
  - 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 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.



**SECTION 4. APPENDIX B**

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**General Conditions**

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.

## SECTION 4. APPENDIX C

### Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

#### EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. 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)(c), F.A.C.]

## SECTION 4. APPENDIX C

### Common Conditions

#### RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. Emissions Computation and Reporting:
- a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
  - b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
    - (1) *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.
      - (a) 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.
      - (b) 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.
      - (c) 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.
    - (2) *Continuous Emissions Monitoring System (CEMS)*.
      - (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
        - 1) 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 4. APPENDIX C

### Common Conditions

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

- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) 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:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
  - 2) 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.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other 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.
- (3) Mass Balance Calculations.
- (a) 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:
- 1) 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
  - 2) 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.
- (b) 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.
- (c) 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.
- (4) Emission Factors.
- a. 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.
- 1) 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

## SECTION 4. APPENDIX C

### Common Conditions

operational and physical configuration of the unit.

- 2) 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.
  - 3) 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 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.
- b. 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.
- (5) 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.
  - (6) 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.
  - (7) 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.
  - (8) 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.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
  - a. All Title V sources.
  - b. All synthetic non-Title V sources.
  - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
  - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.

SECTION 4. APPENDIX C

Common Conditions

- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

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## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Monday, December 28, 2009 2:21 PM  
**To:** 'jaspuru@ouc.com'  
**Cc:** 'dstalls@ouc.com'; 'Scott\_Osourn@golder.com'; Shine, Caroline; 'lori.cunniff@ocfl.net'; 'jodi.dittell@ocfl.net'; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** Orlando Utilities Commission - Stanton Energy Center; 0950137-028-AC  
**Attachments:** Final\_Permit.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** 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 documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950137.028.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.028.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO UTILITIES COMMISSION

**Facility Name:** STANTON ENERGY CENTER

**Project Number:** 0950137-028-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** ORANGE

**Processor:** David Read/ Al Linero

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/eproducts/apds/default.asp>.

Project documents that 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 at (850)488-0114.

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Aspuru, Jan [JAspuru@ouc.com]  
**Sent:** Wednesday, January 06, 2010 8:02 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: Orlando Utilities Commission - Stanton Energy Center; 0950137-028-AC

Ms Livingston

I am in receipt of your email. Thank you.

Jan C. Aspuru  
VP - Power Resources  
Orlando Utilities Commission  
407-649-3944 (w)  
407-275-4120 (f)

### DISCLAIMER:

Florida has a very broad public records law. As a result, any written communication created or received by Orlando Utilities Commission officials and employees will be made available to the public and media, upon request, unless otherwise exempt. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this office. Instead, contact our office by phone or in writing.

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Tuesday, January 05, 2010 11:29 AM  
**To:** Aspuru, Jan  
**Subject:** FW: Orlando Utilities Commission - Stanton Energy Center; 0950137-028-AC

Dear Ms. Aspuru:

We have not received confirmation that you were able to access the documents attached to this December 28th e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)



**From:** Livingston, Sylvia

**Sent:** Monday, December 28, 2009 2:21 PM

**To:** 'jaspuru@ouc.com'

**Cc:** 'dstalls@ouc.com'; 'Scott\_Osbourn@golder.com'; Shine, Caroline; 'lori.cunniff@ocfl.net'; 'jodi.dittell@ocfl.net'; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)

**Subject:** Orlando Utilities Commission - Stanton Energy Center; 0950137-028-AC

Dear Sir/ Madam:

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*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 documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950137.028.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.028.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO UTILITIES COMMISSION

**Facility Name:** STANTON ENERGY CENTER

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**Permit Activity:** CONSTRUCTION

**Facility County:** ORANGE

**Processor:** David Read/ Al Linero

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Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto: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>.