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BUREAU OF
AIR REGULATION

March 16, 2011

Mr. Robert Bull, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road,
MS 5000
Tallahassee, Florida 32399-2400

RE: APPLICATION FOR AIR PERMIT REVISION
STANTON ENERGY CENTER
FACILITY ID NO. 0950137

Dear Mr. Bull:

Project No. : 0950137-036-AC
0950137-037-AV

Enclosed please find one original and three copies of an application for the concurrent processing of revisions to the recently issued Title V Air Operation Permit No. 0950137-031-AV and Construction Permit No. PSD-FL-373A (Project No. 0950137-020-AC). Specifically, during the process of revising the Title V permit to incorporate the conditions of Construction Permit No. 0950137-020-AC, OUC had requested certain revisions. The Department advised Orlando Utilities Commission that the requested changes required associated revisions to the underlying construction permit conditions. Therefore, this application serves to request concurrent processing of changes to conditions pertaining to both referenced permits.

In addition, on December 22, 2010, Orlando Utilities Commission received the Department's Final Air Construction Permit (0950137-032-AC) which re-established the maximum heat input rates for Units 1 and 2. Therefore, this application also serves to request the processing of revisions to Permit No. 0950137-031-AV to incorporate the terms and conditions of this recently issued Construction Permit. Specifically, this permitting action is to incorporate the revised heat input limits associated with Fossil Fuel Fired Electric generator Nos. 1 and 2 (EU Nos. 001 and 002).

Orlando Utilities Commission looks forward to working with you on this permitting effort. If you would like to discuss any issues regarding this application, please contact David Baez by telephone at (407) 434-3072 or Scott Osbourn, P.E. of Golder Associates at (813) 287-1717 in Tampa.

Sincerely,

GOLDER ASSOCIATES INC.

Scott Osbourn, PE
Associate and Tampa Operations Manager

Attachments

Cc: Jonathon Holtom, FDEP
Mike Halpin, DEP Sitting Office
Garfield Blair, OUC
David Baez, OUC

Golder Associates Inc.
5100 W. Lemon Street, Suite 208
Tampa, FL 33609 USA

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Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America



REPORT

AIR PERMIT REVISION APPLICATION

STANTON ENERGY CENTER
ORLANDO, ORANGE COUNTY, FLORIDA

Submitted To: Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Submitted By: Golder Associates Inc.
5100 W. Lemon Street
Suite 208
Tampa, FL 33609 USA

Distribution: 4 Copies—Florida Department of Environmental Protection
2 Copies—Orlando Utilities Commission
2 Copies—Golder Associates Inc.

March 2011

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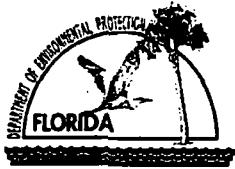
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Attachment 1 Requested Changes to Current Title V Air Operation Permit

APPLICATION FOR PERMIT



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Orlando Utilities Commission	
2. Site Name: Stanton Energy Center	
3. Facility Identification Number: 0950137	
4. Facility Location... Stanton Energy Center Street Address or Other Locator: 5100 South Alafaya Trail City: Orlando County: Orange Zip Code: 32193	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: David R. Baez	
2. Application Contact Mailing Address... Organization/Firm: Orlando Utilities Commission Street Address: P.O. Box 3193 City: Orlando State: FL Zip Code: 32802	
3. Application Contact Telephone Numbers... Telephone: (407) 434-3072 ext. Fax: (407) 244 - 8794	
4. Application Contact E-mail Address: dbaez@ouc.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 3-17-11	3. PSD Number (if applicable):
2. Project Number(s): 0950137-036701	4. Siting Number (if applicable):

0950137-037-AV

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is for the concurrent processing of revisions to the recently issued Title V Air Operation Permit No. 0950137-031-AV and Construction Permit No. PSD-FL-373A (Project No. 0950137-020-AC). Specifically, during the process of revising the Title V permit to incorporate the conditions of Construction Permit No. 0950137-020-AC, OUC had requested certain revisions. The Department advised Orlando Utilities Commission that the requested changes required associated revisions to the underlying construction permit conditions. Therefore, this application serves to request concurrent processing of changes to conditions pertaining to both referenced permits.

In addition, on December 22, 2010, Orlando Utilities Commission received the Department's Final Air Construction Permit (0950137-032-AC) which re-established the maximum heat input rates for Units 1 and 2. Therefore, this application also serves to request the processing of revisions to Permit No. 0950137-031-AV to incorporate the terms and conditions of this recently issued Construction Permit. Specifically, this permitting action is to incorporate the revised heat input limits associated with Fossil Fuel Fired Electric generator Nos. 1 and 2 (EU Nos. 001 and 002).

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	Fossil Fuel Fired Steam Electric Generator No. 1	AV02	NA
002	Fossil Fuel Fired Steam Electric Generator No. 2	AV02	NA
030	Unit B is comprised of: a nominal 150 MW natural gas-fueled General Electric 7FA CTG equipped with evaporative inlet air cooling and power (steam) augmentation equipment; a supplementary-fired HRSG with a nominal 531 mmBtu/hr DB; a HRSG stack; and a nominal 150 MW STG.	AV02	NA

Application Processing Fee

Check one: Attached - Amount: _____ Not Applicable

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ext. Fax:
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature _____ Date

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name: Jan C. Aspuru, VP of Power Resources
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address. P.O. Box 3193, Orlando FL 32802.. Organization/Firm: Orlando Utilities Commission Street Address: Reliable Plaza, 100 West Anderson City: Orlando State: FL Zip Code: 32801
4. Application Responsible Official Telephone Numbers... Telephone: (407) 658 - 6444 ext. 3900 Fax: (407) 275 - 4120
5. Application Responsible Official E-mail Address: <u>jaspuru@ouc.com</u>

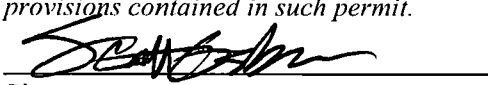
6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.


Signature

3/14/11
Date

Professional Engineer Certification

1. Professional Engineer Name: Scott H. Osbourn Registration Number: 57557
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 5100 West Lemon St., Suite 208 City: Tampa State: FL Zip Code: 33609
3. Professional Engineer Telephone Numbers... Telephone: (813) 287-1717 ext. 53304 Fax: (813) 287-1716
4. Professional Engineer E-mail Address: sosbourn@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature <u></u> Date <u>3/14/11</u> (seal)

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization # 00001670



Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Total PM/PM₁₀/PM_{2.5}	A	N
CO	A	N
SAM /SO₂	A	N
NO_x	A	N
VOC	A	N

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: May 21, 2009
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: May 21, 2009
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: May 21, 2009

Additional Requirements for Air Construction Permit Applications-- NA

1.	Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3.	Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4.	List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
5.	Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10.	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications-- NA

1. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (revision application)
2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan: (Required for all initial/revision/renewal applications) <input type="checkbox"/> Attached, Document ID: _____ Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Requested Changes to Current Title V Air Operation Permit: <input checked="" type="checkbox"/> Attached, Document ID: Attachment 1 _____ <input type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

<p>1. Acid Rain Program Forms:</p> <p>Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>May 21, 2009</u></p> <p><input type="checkbox"/> Not Applicable (not an Acid Rain source)</p> <p>Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>May 21, 2009</u></p> <p><input type="checkbox"/> Not Applicable</p> <p>New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p>
<p>2. CAIR Part (DEP Form No. 62-210.900(1)(b)):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>May 21, 2009</u></p> <p><input type="checkbox"/> Not Applicable (not a CAIR source)</p>

Additional Requirements Comment

ATTACHMENT 1
REQUESTED CHANGES TO CURRENT TITLE V AIR OPERATION PERMIT

STATEMENT OF BASIS
Orlando Utilities Commission, Stanton Energy Center
Title V Air Operation Permit Revision
Permit No. 0950137-031-AV

APPLICANT

The applicant for this project is Orlando Utilities Commission. The applicant's responsible official and mailing address are: Ms. Denise M. Stalls, Vice President Environmental Affairs, Orlando Utilities Commission, Stanton Energy Center, P. O. Box 3193, Orlando, FL 32802.

PROJECT DESCRIPTION

The purpose of this permitting action is to revise the existing Title V permit by incorporating the new 300 megawatt (MW) combined cycle Unit B and its associated equipment, which began commercial operation on October 27, 2009.

FACILITY DESCRIPTION

The applicant operates the existing Stanton Energy Center, which is located in Orange County at 5100 South Alafaya Trail, Orlando, Florida 32193.

On March 25, 2008, a Prevention of Significant Deterioration (PSD) Permit (PSD-FL-373A) was issued to Orlando Utilities Commission (OUC) for the construction of a new 300 MW combined cycle unit.

The Curtis H. Stanton Energy Center currently consists of the following new units:

- Unit B (Emission Unit 037) is comprised of: a nominal 150 MW natural gas-fueled General Electric 7FA combustion turbine generator (CTG) equipped with evaporative inlet air cooling and power (steam) augmentation equipment; a supplementary-fired heat recovery steam generator (HRSG) with a nominal 531 MMBtu/hr duct burner (DB); a HRSG stack; and a nominal 150 MW steam electric generator (STG).

Unit B is equipped with Dry Low nitrogen oxide (NO_x) combustors as well as a selective catalytic reduction (SCR) system in order to control NO_x emissions to 2 ppmvd at 15% oxygen (O₂) while firing natural gas. During fuel oil firing, emissions shall be held to 8 parts per million by volume, dry basis (ppmvd), at 15% O₂ using SCR plus water injection. Pipeline quality natural gas, 0.0015% ultra low fuel sulfur oil, and good combustion practices shall be employed to control all pollutants.

- Unit B six-cell mechanical cooling tower (Emission Unit 038) with individual exhaust fans and drift eliminators, and;
- Unit B Nominal 1,000,000 gallons ultra low sulfur diesel (ULSD) fuel oil storage tank (Emission Unit 039).

The existing old units at the site are:

- Fossil fuel fired steam generator (FFSG) No. 1 (Emission Unit 001) consists of a Babcock and Wilcox wall fired dry bottom boiler (Model RB 611) and steam turbine which drives a generator with a nameplate rating of 468 megawatts. FFSG No.1 began commercial operation on May 12, 1987.
- Fossil fuel fired steam generator No. 2 (Emission Unit 002) consists of a Babcock and Wilcox boiler/steam generator (Model RB 621) and steam turbine which drives a generator with a nameplate rating of 468 megawatts. FFSG No. 2 began commercial operation on March 29, 1996.

Each unit has its own 550 foot exhaust stack and is fired primarily on bituminous coal and secondarily on No. 6 fuel oil and on-specification used oil for startup and flame stabilization. The maximum heat input for each unit is ~~4,800~~ 4,286 MMBtu per hour. Pipeline quality natural gas, as well as landfill gas, is also approved for combustion, although petroleum coke is not approved. Particulate matter emissions generated during the operation of each unit are controlled by a dry electrostatic precipitator (ESP) manufactured by Wheelabrator-Frye Inc. The control efficiency of the ESP is 99.7%. Sulfur dioxide emissions are controlled by flue gas

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 001 and 002

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
001	Fossil Fuel Fired Steam Generator No. 1
002	Fossil Fuel Fired Steam Generator No. 2

Fossil fuel fired steam generator # 1 is a nominal 468 megawatt steam generator designated as Unit # 1. The emission unit is fired primarily on bituminous coal and secondarily on No. 6 fuel oil for startup and flame stabilization, as permitted herein, with a maximum heat input of 4,800 4,286 MMBtu per hour. Stack height is 550 feet, stack exit diameter is 19.0 feet, flow rate is 1,420,000 actual cubic feet per minute (acfm) at 127 degrees Fahrenheit, stack exit velocity is 83.5 feet per second.

Fossil fuel fired steam generator # 2 is a nominal 468 megawatt steam generator designated as Unit # 2. The emission unit is fired primarily on bituminous coal and secondarily on No. 6 fuel oil and on-specification used oil for startup and flame stabilization, as permitted herein, with a maximum heat input of 4,800 4,286 MMBtu per hour. Stack height is 550 feet, stack exit diameter is 19.0 feet, flow rate is 1,310,120 acfm at 124 degrees Fahrenheit, stack exit velocity is 77.0 feet per second.

Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units have an individual 550 foot exhaust stack. Particulate matter emissions generated during the operation of the unit are controlled by a dry electrostatic precipitator (ESP) manufactured by Wheelabrator-Frye Inc. The control efficiency of the ESP is 99.7%. Sulfur dioxide emissions are controlled by flue gas desulfurization equipment manufactured by Combustion Engineering.

Each boiler/steam generator (i.e., units #1 and #2) are regulated under the federal Acid Rain Program, Phase II, adopted and incorporated by reference in Rule 62-204.800, F.A.C. These units hold ORIS code 0564.

Emission Units 1 and 2 are subject to compliance assurance monitoring (CAM) for particulate matter (PM) emissions controlled by an ESP. Because the continuous opacity monitoring system (COMS) is required to be used at the facility (for Phase II Acid Rain Program purposes), it must also be used as part of the CAM plan. *A CAM plan is included for the ESP. See Appendix CAM.*

{Permitting note(s): The emissions units are regulated under Acid Rain, Phase II; NSPS-40 CFR 60, Subpart Da, Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After September 18, 1978, adopted and incorporated by reference in Rule 62-204.800(7)(b)2, F.A.C.; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); and Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT), and Compliance Assurance Monitoring (CAM). Fossil fuel fired steam generator # 1 began commercial operation on May 12, 1987; and fossil fuel fired steam generator # 2 began commercial operation on June 1, 1996.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable heat input rate is as follows; based on a 4-hour block average:

<u>Unit Nos.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
001	<u>4,800 4,286</u>	Coal, No. 6 fuel oil, on-site generated lubricating oil and used fuel oil which meets the requirements of 40 CFR 266.40, landfill gas from the Orange County Landfill and natural gas as supplied by commercial pipeline.
002	<u>4,800 4,286</u>	

[Rules 62-4.160(2), 62-204.800 and 62-210.200(PTE), F.A.C.; PSD FL 084; and Department Order Modifying Conditions of Power Plant Certification dated December 24, 1997] 0950137-032-AC

{Permitting Note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 001 and 002

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

A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation.

a. Fuels. The fuels that are allowed to be burned in this unit/these units are:

- (1) Coal, primary fuel,
- (2) Natural gas,
- (3) New No. 6 fuel oil,
- (4) On-site generated lubricating oil,
- (5) On-specification used oil (see Specific Condition A.42.), and
- (6) Landfill gas from the Orange County Landfill.

b. Flue Gas Desulfurization System (FGD). No fraction of flue gas shall be allowed to bypass the FGD system to reheat the gases exiting from the FGD system, if the bypass will cause overall SO₂ removal efficiency less than 90 percent (or 70 percent for mass SO₂ emission rates less than or equal to 0.6 lb/million Btu 30 day rolling average). The percentage and amount of flue gas bypassing the FGD system shall be documented and records kept for a minimum of two years available for Department's inspection. The flue gas scrubber shall be put into service during normal operational startup, and shutdown, when No. 6 fuel oil is being burned. The flue-gas desulfurization system and mist eliminators for Unit 2 will be maintained and operated in a manner consistent with good air pollution practice for minimizing emissions pursuant to the requirements of 40 C.F.R. 60.11(d).

[Rules 62-4.070(3) and 62-213.410, F.A.C.; 40 CFR 60.40Da, and PSD-FL-084]

A.4. Hours of Operation. These emissions units may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging times for Specific Conditions A.5. – A.16. are based on the specified averaging time of the applicable test method.

A.5. Particulate Matter. Particulate matter emissions shall not exceed any of the following:

a. Unit 1.

- (1) 0.03 lb/million Btu heat input and 1 percent of the potential combustion concentration (99 percent reduction) when combusting solid fuel;
- (2) 0.03 lb/million Btu and 30 percent of potential combustion concentration (70 percent reduction) when combusting liquid fuel (No. 6 fuel oil); or,
- (3) 124.1 lbs/hour and 543.5 tons/year, based on the heat input rate listed in Specific Condition A.1.

b. Unit 2.

- (1) 0.02 lb/million Btu heat input and 1 percent of the potential combustion concentration (99 percent reduction) when combusting solid fuel. This standard applies at all times except during periods of startup, shutdown, or malfunction.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 001 and 002

A.9. Ammonia Slip. Ammonia slip from the NO_x control system shall be limited to less than 30 ppmv, uncorrected. [Rule 62-204.800(8) and 42-214, F.A.C.; and 40 CFR 60.44Da]

A.10. Carbon Monoxide. Emissions of CO from Unit 1 shall not exceed 0.18 lb/mmBtu heat input on a 30-operating day rolling average as demonstrated by the required continuous emissions monitoring system (CO CEMS)–~~and carbon monoxide (CO) emissions from Unit No. 2 shall not exceed 0.15 lb/million Btu heat input on a 30-operating day rolling average as demonstrated by the required CO-CEMS, excluding periods of startup, shutdown and malfunction.~~ Based upon a heat input of 4286 million Btu/hr, CO emissions shall not exceed 643 lb/hr (2,816 TPY) for all periods of operation including startup, shutdown and malfunction. [PSD-FL-084; 0950137-015-AC, Specific Condition 9.]

A.11. Volatile Organic Compounds. Volatile Organic Compounds (VOC) emissions from Unit No. 2 shall not exceed 0.015 lb/million Btu heat input. Based upon a heat input of 4,286 million Btu/hr, VOC emissions shall not exceed 64 lb/hr (282 TPY). [PSD-FL-084]

A.12. Sulfuric Acid Mist. Sulfuric acid mist (H₂SO₄) emissions from Unit No. 2 shall not exceed 0.033 lb/million Btu heat input. Based upon a heat input of 4,286 million Btu/hr, H₂SO₄ emissions shall not exceed 140 lb/hr (613 TPY). [PPS PA 81-14/SA1]

~~**A.13. Beryllium.** Beryllium (Be) emissions from Unit No. 2 shall not exceed 5.2x10⁻⁶ lb./million Btu heat input. Based upon a heat input of 4286 million Btu/hr, Be emissions shall not exceed 0.022 lb./hr (0.1 TPY). [PPS PA 81-14/SA1]~~

A.14. Mercury. Mercury (Hg) emissions from Unit No. 2 shall not exceed 1.1x10⁻⁵ lb/million Btu heat input. Based upon a heat input of 4,286 million Btu/hr, Hg emissions shall not exceed 0.046 lb/hr (0.2 TPY). [PPS PA 81-14/SA1]

~~**A.15. Lead.** Lead (Pb) emissions testing will only be required if reasonable assurance is required by the Department under the special testing requirements of 62-297.310, F.A.C. Unit No. 2 shall not exceed 1.5x10⁻⁴ lb/million Btu heat input. Based upon a heat input of 4,286 million Btu/hr, Pb emissions shall not exceed 0.64 lb/hr (2.8 TPY). [PPS PA 81-14/SA1]~~

~~**A.16. Fluorides.** The permittee will determine coal fluoride content by random sampling and analysis on a quarterly basis. Fluorides (Fl) emissions from Unit No. 2 shall not exceed 4.2x10⁻⁴ lb/million Btu heat input. Based upon a heat input of 4,286 million Btu/hr, Fl emissions shall not exceed 1.8 lb/hr (7.9 TPY). [PPS PA 81-14/SA1]~~

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.17. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

A.18. Excess Emissions Allowed. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]

A.19. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

REQUESTED CONCURRENT PERMIT REVISIONS

Based on discussions with the Department, OUC requests permit revisions through a concurrent TV/AC permit revision process. Specifically, changes to Specific Conditions F.18, F.19, F.20, F.23 and F.27 are requested as follows:

1. As described below, Orlando Utilities Commission (OUC) requests that Title V Air Operation Permit No. 0950137-031-AV condition F.18 (Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.18) define a CTG/HRSG System Hot Startup and its emissions, and modify the fuel switching provision. OUC is requesting that the fuel switching allowance cover oil-to-gas and gas-to-oil fuel switching, as well as a change from a one-hour fuel switch allowance to a 2-hour allowance. Currently, the TV permit only allows for a 1 hour window and OUC contends it cannot be done safely within that timeframe. Finally, if a malfunction occurs during startup, the Department has interpreted the permit to allow for additional excess emissions beyond those specified below (see attached email from Al Linero, dated January 6, 2011).

F.18. Excess Emissions Allowed. *Excess emissions resulting from startup, shutdown, and documented malfunctions shall be permitted, provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. For the CTG/HRSG system, excess NOx and CO emissions resulting from startup, shutdown, or documented malfunctions shall not exceed two hours in any 24-hour period except for the following specific cases. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.*

a. CTG/HRSG System Cold Startup. For cold startup of the CTG/HRSG system, excess NOx and CO emissions from the CTG/HRSG system shall not exceed six hours (360 minutes) in any 24-hour period. A "cold startup of the CTG/HRSG system" is defined as startup of the combined cycle system following a shutdown of the steam turbine lasting at least 48 hours. In the event that a documented malfunction occurs during startup, additional excess emissions shall be allowed.

{Permitting Note: During a cold startup of the steam turbine system, the CTG/HRSG system is brought on line at low load to gradually increase the temperature of the steam turbine generator (STG) and prevent thermal metal fatigue}

b. CTG/HRSG System Warm Startup. For warm startup of the CTG/HRSG system, excess NOx and CO emissions shall not exceed four hours (240 minutes) in any 24-hour period. A "warm startup of the CTG/HRSG system" is defined as a startup of the combined cycle system following a shutdown of the steam turbine lasting at least 8 hours and less than 48 hours. In the event that a documented malfunction occurs during startup, additional excess emissions shall be allowed.

c. CTG/HRSG System Hot Startup. For hot startup of the CTG/HRSG system, excess NOx and CO emissions shall not exceed 120 minutes in a 24-hour block period. A "hot startup of the CTG/HRSG system" is defined as a startup of the combined cycle system following a shutdown of the steam turbine for 8 hours or less. In the event that a documented malfunction occurs during startup, additional excess emissions shall be allowed.

ed. Shutdown. For shutdown of the combined cycle operation, excess NOx and CO emissions from the CTG/HRSG system shall not exceed three hours in any 24-hour period.

de. Fuel Switching. Excess NOx and CO emissions due to oil-to-gas and gas-to-oil fuel switching shall not exceed 2 hours (120 minutes) each, respectively, in any a 24-hour block period.

[Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.18]

2. As described below, OUC requests that Title V Air Operation Permit No. 0950137-031-AV condition F.19 (Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.19) clarify that SCR operational procedures will follow SCR vendor recommended operating procedures (i.e., when the SCR catalyst temperature is in the proper range for effective SCR operation).

F.19. Ammonia Injection. *Ammonia injection shall begin as soon as operation of the CTG/HRSG SCR emission control system achieves the operating parameters specified by the SCR manufacturer. As authorized by Rule 62-210.700(5), F.A.C., the above condition allows excess emissions only for specifically defined periods of startup, shutdown, fuel switching, and documented malfunction of the CTG/HRSG system including the pollution control equipment. [Rules 62-212.400(BACT) and 62-210.700, F.A.C.; and, Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.19]*

3. As described below, OUC requests that Title V Air Operation Permit No. 0950137-031-AV condition F.20 (Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A20) remove obsolete permit language, include wet injecting tuning and provide additional examples of a "major tuning session". The Department is encouraging proper maintenance and tuning as required; however has indicated that these changes need to be made through an AC permit revision, per this submittal.

F.20. DLN Tuning. *CEMS data collected during ~~initial or other~~ major DLN or wet injection tuning sessions shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A "major tuning session" would occur after ~~completion of initial construction~~, a combustor change-out, a major repair or maintenance to a combustor, as required to maintain compliance, or other similar circumstances identified or requested by the equipment vendor. Prior to performing any major tuning session, the permittee shall provide the Compliance Authority with an advance notice of at least 14 days that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail. [Rule 62-4.070(3), F.A.C.; and, Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.20]*

4. As described below, OUC requests that Title V Air Operation Permit No. 0950137-031-AV condition F.23 (Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A23) reduce ammonia slip testing from an annual basis to a five-year basis. Per Rule 62-297.310(7)(a)4.b., F.A.C, if potential ammonia slip emissions are less than 100 TPY, annual testing is not required.

F.23. Annual Compliance Tests. *During each federal fiscal year (October 1st, to September 30th), the CTG shall be tested to demonstrate compliance with the emission standard for visible emissions. NOx and CO emissions data collected during the required continuous monitor Relative Accuracy Test Audits (RATAs) may be used to demonstrate compliance with the CO and NOx standards. ~~Annual~~ Testing to determine the ammonia slip shall be conducted once every five (5) years while firing the primary fuel. NOx emissions recorded by the CEMS shall be reported for each ammonia slip test run. CO emissions recorded by the CEMS shall be reported for the visible emissions observation period. [Rules 62-212.400 (BACT) and 62-297.310(7)(a)4, F.A.C.; and, Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.23]*

5. As described below, OUC requests that Title V Air Operation Permit No. 0950137-031-AV condition F.27 (Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A27) exclude one-minute average emission data in lieu of an entire hour exclusion (hourly average) of emission data to minimize the duration of data excluded and more accurately reflect the actual time of episodes of startup, shutdown, malfunction, fuel switches and DLN tuning. This reduces the possibility of over-calculating the total time of "excludable" episodes.

F.27. CEMS Data Requirements. (For BACT Limits Only)

a. *Data Collection.* Emissions shall be monitored and recorded at all times including startup, operation, shutdown, and malfunction except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments. The CEMS shall be designed and operated to sample, analyze, and record data evenly spaced over an hour. If the CEMS measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEMS shall be expressed as ppmvd corrected to 15% oxygen. The CEMS shall be used to demonstrate compliance with the CEMS emission standards for CO and NOX as specified in this permit. For purposes of determining compliance with the CEMS emissions standards of this permit, missing (or excluded) data shall not be substituted.

b. *Valid Hour.* Hourly average values shall begin at the top of each hour. Each hourly average value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). If less than two such data points are available, the hourly average value is not valid. An hour in which any oil is fired is attributed towards compliance with the permit standards for oil firing. An hour in which power augmentation is utilized is attributed towards compliance with the permit standards for power augmentation. The permittee shall use all valid measurements or data points collected during an hour to calculate the hourly average values.

c. *24-hour Block Averages.* A 24-hour block shall begin at midnight of each operating day and shall be calculated from 24 consecutive hourly average emission rate values. If a unit operates less than 24 hours during the block, the 24-hour block average shall be the average of all available valid hourly average emission rate values for the 24-hour block. For the CEMS compliance demonstration, hourly average emission rates calculated during episodes of startup, shutdown, malfunction, tuning, or fuel switching subject to the provisions of Specific Condition Nos. F.18 and F. 20 will exclude the one-minute average data corresponding to these episodes. For purposes of determining compliance with the 24-hour CEMS standards, the missing data substitution methodology of 40 CFR Part 75, Subpart D, shall not be utilized. Instead, the 24-hour block average shall be determined using the remaining hourly data in the 24-hour block. [Rule 62-212.400(BACT), F.A.C.]
{Permitting Note: There may be more than one 24-hour compliance demonstration required for CO and NOX emissions depending on the use of alternate methods of operation}

d. *12-month Rolling Averages.* Compliance with the long-term emission limit for CO shall be based on a 12-month rolling average. Each 12-month rolling average shall be the arithmetic average of all valid hourly averages collected during the current calendar month and the previous 11 calendar months.

e. *Data Exclusion.* Each CEMS shall monitor and record emissions during all operations including episodes of startup, shutdown, malfunction, fuel switches and DLN tuning. Some of the one minute average CEMS emissions data recorded during these episodes may be excluded from the corresponding CEMS compliance demonstration subject to the provisions of Specific Condition Nos. F.18 and F.20. All periods of one minute average data excluded shall be consecutive for each such episode and only data obtained during the described episodes (startup, shutdown, malfunction, fuel switches, DLN tuning) may be used for the appropriate exclusion periods. The permittee shall minimize the duration of data excluded for such episodes to the extent practicable. Data recorded during such episodes shall not be excluded if the episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented. Best operational practices shall be used to minimize hourly emissions that occur during such episodes. Emissions of any

quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited.

f. *Availability.* Monitor availability for the CEMS shall be 95% or greater in any calendar quarter. The quarterly excess emissions report shall be used to demonstrate monitor availability. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit, except as otherwise authorized by the Department's Compliance Authority. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.; and, Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.27].

F.33 Excess Emissions Reporting

b. *SIP Quarterly Permit Limits Excess Emissions Report.* Within 30 days following the end of each calendar-quarter, the permittee shall submit a report to the Compliance Authority summarizing periods of CO and NOx emissions in excess of the BACT permit standards following the NSPS format in 40 CFR 60.7(c), Subpart A. Excess emissions that occur during periods of startup, shutdown and malfunction shall be monitored, recorded and reported as excess emissions for those hourly periods during which they occur and not for the entire averaging period. These hourly excess emission periods shall then be, that are excluded from the block averages calculated to demonstrate compliance with the emission limits specified within this permit, shall be monitored, recorded and reported as excess emission levels exceed the standards specified in this permit. The duration of excess emissions shall be the duration of the periods of data excluded for such episodes. In addition, the report shall summarize the CEMS systems monitor availability for the previous quarter.

Osborn, Scott

From: Linero, Alvaro [Alvaro.Linero@dep.state.fl.us]
Sent: Thursday, January 06, 2011 4:12 PM
To: Baez, David R.
Cc: Koerner, Jeff; Osborn, Scott; Shine, Caroline
Subject: Startups at OUC Stanton Unit B

Dear Mr. Baez:

Re: Your inquiry about malfunction and cold startup excess emissions from OUC Stanton Unit B

I was the P.E. who prepared the technical evaluation for the subject unit and who sealed the permit documents.

We agree with your interpretation that a malfunction occurring during startup will provide for additional excess emissions beyond the six hours allowed for a cold startup.

Please be sure to let the District know should you have such a malfunction so the emissions can be excluded.

I understand you took a conservative approach and shut the unit down before reaching six hours in the cold startup attempt.

The shutdown occurred after detecting the malfunction.

I understand OUC is preparing a permit modification application to clarify this matter further.

The permit modification is not required.

However if you still prefer a clearer condition you can submit that application with requested language for consideration or we'll address it within your next permit application for Stanton facility.

I plan to visit next Friday, January 14th on my way to South Florida to gain a further understanding of the kinds of similar situations that would prompt the shutdown of this very clean unit.

Sincerely,

Alvaro Linero, P.E.
Program Administrator.

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