

Memorandum

Florida Department of Environmental Protection

TO: Jeff Koerner, Program Administrator
THROUGH: Jonathan Holtom, Title V Section *JH*
FROM: Teresa Heron *TH*
DATE: June 14, 2011
SUBJECT: Draft/Proposed Permit No. 0950137-037-AV
Draft Construction Permit No. 0950137-036-AC (PSD-FL-395A, PSD-FL-373B)
Orlando Utilities Commission, Stanton Energy Center
Concurrent Construction Permit Modification and Title V Air Operation Permit Revision

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Statement of Basis;
- Draft/proposed Title V permit;
- ~~Technical Evaluation and Draft Construction Permit Modification;~~ and
- P.E. Certification.

The air construction permit authorizes the modification of certain conditions for Units 1, 2 and B, mostly related to excess emissions data exclusion. The draft/proposed Title V permit incorporates these changes for the Stanton Energy Center, which is located in Orange County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance. The P.E. certification briefly summarizes the proposed project.

The application was received on March 17th. An RAI letter was not sent and the application was deemed complete. Day 90 is June 15th. There is no ongoing/open enforcement case for this facility, according to the Central District Office.

We recommend your approval of the attached draft/proposed permits.

Attachments



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronic Mail – Received Receipt Requested

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

Re: Permit Nos. 0950137-036-AC (PSD-FL-395A, PSD-FL-373B) and 0950137-037-AV
Stanton Energy Center
Minor Construction Permit Modification and Title V Permit Revision


Dear Ms. Stalls:

Enclosed is the draft/proposed permit package to issue an air construction permit modification and to revise the Title V air operation permit for the Stanton Energy Center. This facility is located in Orange County at 5100 South Alafaya Trail, Orlando, Florida. The permit package includes the following documents:

- The Technical Evaluation and Preliminary Determination, which establishes the basis for approving the requested changes made in the construction permit.
- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes included in this Title V permit revision.
- The draft construction permit and the draft/proposed Title V air operation permit revisions, which include the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits provides important information regarding: the Permitting Authority's intent to issue air permits for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue air permits; the procedures for submitting comments on the draft/proposed permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permits must be published as soon as possible and the original proof of publication affidavit must be provided to the Department within seven days of the date of publication. Because the Title V permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address: oquendo.ana@epamail.epa.gov.

If you have any questions, please contact the Project Engineer, Teresa Heron by telephone at (850) 717-9082 or by email at teresa.heron@dep.state.fl.us or the Section Administrator P.E., Jonathan Holtom by telephone at (850) 717-9079 or by email at jonathan.holtom@dep.state.fl.us.

Sincerely,

for 
Jeffery F. Koerner, Program Administrator
Permitting and Compliance Section
Division of Air Resource Management

6/19/11
Date

Enclosures
JFK/jkh/tmh

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

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

Orlando Utilities Commission
P. O. Box 3193
Orlando, Florida 32802

Responsible Official:

Denise Stalls, Vice President Environmental Affairs

Permit Nos. 0950137-036-AC (PSD-FL-395A, PSD-FL-373B) and 0950137-037-AV
Facility ID No. 0950137
Stanton Energy Center
Title V Air Operation Permit Revision
Orange County, Florida

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

Project: The purpose of this project is to revise the Title V air operation permit No. 0950137-031-AV to modify certain specific conditions established in construction permit Nos. 0950137-020-AC (PSD-FL-373A) and 0950137-015-AC (PSD-FL-395). Details of the project are provided in the application and the enclosed Statement of Basis.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work.

Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Technical Evaluation and Preliminary Determination, the draft/proposed permits, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permits by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

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

The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit revision in accordance with the conditions of the draft/proposed permit revision unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permits (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

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

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

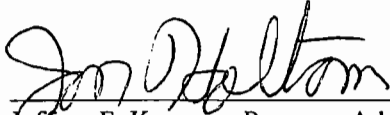
Mediation: Mediation is not available in this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit revision as a proposed Title V air operation permit revision and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: ouendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

Executed in Tallahassee, Florida.

for 
Jeffery F. Koerner, Program Administrator
Permitting and Compliance Section
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit Revisions (including the Public Notice, the Statement of Basis, and the Draft/Proposed Permits), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 6/14/11 to the persons listed below.

- Ms. Denise Stalls, Vice President Environmental Affairs, Orlando Utilities Commission: dstalls@ouc.com
- Mr. David R. Baez, Orlando Utilities Commission: dbaez@ouc.com
- Mr. Scott H. Osbourn, P.E., Golder & Associates: sosbourn@golder.com
- Ms. Caroline Shine, DEP - Central District Office: caroline.shine@dep.state.fl.us
- Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov
- Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov
- Ms. Barbara Friday, DEP - BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
- Ms. Victoria Gibson, DEP - BAR: victoria.gibson@dep.state.fl.us (for reading file)

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) (Date) 6/14/11

P.E. CERTIFICATION STATEMENT

PERMITTEE

Orlando Utilities Commission
P. O. Box 3193
Orlando, FL 32802


Permit No. 0950137-036-AC (PSD-FL-395A,
PSD-FL-373B)
Facility ID No. 0950137
Stanton Energy Center
Title V Air Operation Permit Revision
Orange County, Florida

PROJECT DESCRIPTION

This project is to revise the prevention of significant deterioration (PSD) permit Nos. 0950137-020-AC (PSD-FL-373A) and 0950137-015-AC (PSD-FL-395). This permit is issued concurrently with the Title V permit revision No. 0950137-037-AV.

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

This review was conducted by Teresa Heron under my responsible supervision.


Jonathan K. Holtom
Jonathan K. Holtom, P.E. Date: 6/13/11
Registration Number: 0052664

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit Modification No. 0950137-036-AC (PSD-FL-373B and PSD-FL-395A)
Draft/Proposed Air Operation Permit Revision No. 0950137-037-AV
Orlando Utilities Commission, Stanton Energy Center
Orange County, Florida

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

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

Project: The applicant applied on March 17, 2011 to the Department for a concurrent revision/modification of Title V permit No. 0950137-031-AV and its underlying prevention of significant deterioration (PSD) construction permits. This permitting action will modify certain specific conditions established in construction permit Nos. 0950137-020-AC (PSD-FL-373A) and 0950137-015-AC (PSD-FL-395) and Title V permit No. 0950137-031-AV. The existing facility consists of two fossil fuel fired steam electric generating stations, an auxiliary boiler, two combined-cycle combustion turbines, solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage, handling facilities and additional auxiliary equipment.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project.

Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft air construction permit, the draft/proposed air operation permit revision, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft air construction permit and draft/proposed air operation permit revision by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit numbers shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

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

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit revision unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

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

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit revision, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit revision as a proposed Title V air operation permit revision and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: quendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Orlando Utilities Commission
Curtis H. Stanton Energy Center
Orange County

Fossil Fuel Steam Generators Units 1 and 2
and
300-Megawatt Natural Gas-Fueled Combined Cycle Unit B

Project No. 0950137-036-AC (PSD-FL-373B, PSD-FL-395A)
Permit Modification of PSD-FL-373A and PSD-FL-395



Florida Department of Environmental Protection
Division of Air Resource Management
Permitting and Compliance Section

June 14, 2011

1. GENERAL PROJECT INFORMATION.

A. Applicant Name and Address.

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

Authorized Representative: Denise Stalls, Vice President Environmental Affairs

B. Processing Schedule.

March 17, 2011: Department received an application for a minor source air pollution construction permit.
 June 14, 2011: The Intent to Issue PSD Permit Modification and Title V Permit Revision was distributed.

C. Facility Location.

The OUC Curtis H. Stanton Energy Center (the Stanton Plant) is located in Orange County, Southeast of Orlando and North of Highway 528 at 5100 South Alafaya Trail. The existing OUC Stanton Plant consists of two fossil fuel-fired steam electrical generating units, a two-on-one combined cycle unit (Unit A) and a single combined cycle unit (Unit B). Fossil fuel-fired steam electric generating Units 1 and 2 (468 MW each) began operation in 1987 and 1996 while Combined Cycle Unit A (640 MW) began operation in 2003. Combined Cycle Unit B began commercial operation in 2009.

The site is located 144 km southeast from the Chassahowitzka National Wildlife Area; the nearest federal Prevention of Significant Deterioration (PSD) Class I Area. The UTM coordinates for this site are Zone 17, 483.6 km East and 3151.1 North. The location of the OUC Stanton Energy Center is shown in Figure 1.



Figure 1. Project Location near Orlando. Figure 2. Aerial View of the Stanton Plant.

D. Standard Industrial Classification Codes (SIC).

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

E. Air Pollution Regulations.

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary

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Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

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

F. Glossary of Common Terms.

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

G. Facility Regulatory Categories.

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

The facility has units subject to the acid rain provisions of the Clean Air Act.

The facility operates units subject to the provisions of the clean air interstate rule (CAIR) set forth in Rule 62-296.470, F.A.C.

The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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

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

The facility operates units that were certified under the Florida Power Plant Siting Act, 403.501-518, F.S., and Chapter 62-17, F.A.C.

H. Project Description.

The applicant requests revisions to several conditions of Power Plant Siting (PPS) Certification No. PA 81-14/SA1, and permit Nos. 0950137-015-AC (PSD-FL-395) and 0950137-020-AC (PSD-FL-373A), to delete allowable limits and to clarify conditions related to excess emissions and testing requirements.

2. PSD APPLICABILITY.

General PSD Applicability.

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

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal

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units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

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

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

PSD Applicability for Project.

The project, revising proposed permit language, is a minor modification to the above mentioned PSD permits. This project will not increase any emissions limits or production capacity; therefore is not subject to PSD construction review. Consequently, no air modeling was submitted and a new BACT determination is not required.

3. DEPARTMENT REVIEW.

This permit application request is for a minor source air construction permit modification for Units 1, 2 and B. The proposed revisions to permit language for excess emissions provisions and testing frequency requirements do not affect emissions, production rates or any other significant change. A brief description of these requests are stated below, followed by the Department’s position on the requested changes.

A. Requested Permit Modifications for Units 1 and 2 Related to Power Plant Siting Conditions of Certification No. PA 81-14/SA1.

OUC is requesting a deletion of the emissions limits for beryllium (Be), lead (Pb) and fluorides (Fl). In exchange for the deletion of these limits, OUC has proposed to do special compliance tests upon request for lead and random fuel sampling for fluorides in order to periodically demonstrate that the units continue to emit these pollutants at levels less than the limits it is requesting to delete.

Because these conditions were established as federally enforceable requirements in Power Plant Siting Certification (PPS) No. PA 81-14/SA1, which was approved and issued under the authority of the Governor and Cabinet, the Permitting and Compliance Section does not have the legal authority to alter these limits. A request will need to be made to the Siting Office in order to make any changes to these emissions limiting conditions. Since beryllium has been delisted as a PSD pollutant, the Permitting and Compliance Section would not be opposed to the removal of

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the limit from the Conditions of Certification. However, lead and fluorides continue to be regulated as PSD pollutants. Any request to remove these limits would need to be accompanied by sufficient documentation showing that historical actual emissions are much less than the allowable emissions for a removal of the limits to be considered. At the low level of these allowable limits, compliance testing is only required once every five years in order to obtain a renewed Title V air operation permit.

B. Requested Permit Modifications for Units 1 and 2 Related to Permit No. 0950137-015-AC (PSD-FL-395).

OUC is requesting changes to exclude allowable periods of excess emissions documented during periods of startup, shutdown and malfunction from the CEMS-CO data.

The Department reviewed these requests and agreed to the proposed permit language for the CO allowable excess emissions during periods of startup, shutdown and malfunction.

C. Requested Permit Modifications for Combined Cycle Unit B Related to Permit No. 0950137-020-AC (PSD-FL-373A).

During the process of revising the Title V permit to incorporate Unit B, OUC requested changes to certain conditions related to excess emissions. The Department advised OUC that the requested changes required associated revisions to the underlying construction permit conditions. These will be the first air construction permit modifications for Unit B.

The changes requested can be grouped into five categories. These include:

- *Excess Emissions Allowed and Reporting*: Clarification of language regarding allowable excess emissions and reporting during periods of startup, shutdown, malfunction and fuel switching.
- *Continuous Emissions Monitoring Systems (CEMS)*: Clarification of language regarding valid hour, averages, data exclusion during episodes of startup/shutdown and malfunctions.
- *Ammonia Injection*: Clarification of language to explicitly include the selective catalytic reduction (SCR) emission control system in the context of the condition.
- *DLN Tuning*: Clarification to include the wet injection system and defining further what is a major tuning.
- *Frequency of Compliance Tests*: Clarification of language to apply Rule 62-297.300(7) F.A.C. for compliance with the NO_x and VE while burning oil for no more than 400 hours a year and for a reduction of ammonia slip testing from annual to once every five years.

The Department reviewed these requests and generally agrees with the intent of the changes to the proposed permit language. The Department believes there will be no change in the original permit intent or in emissions. Similar requests have previously been approved for other power plants in Florida. The agreed upon changes are further discussed in Section 4, below.

D. Previously Authorized Construction Projects Related to Current Requests.

The following are the relevant permits related to these requests.

1. Fossil Fuel Steam Generators Units 1 and 2 Low NO_x Burners and Overfire Air Project (PSD-FL-395): On April 20, 2010, the Florida Department of Environmental Protection (FDEP) issued an air construction permit pursuant to the rules for the Prevention of Significant Deterioration of Air Quality (PSD) for Unit 1 and 2. This permit authorized the installation of low nitrogen oxides (NO_x) burners (LNB) and an overfire air (OFA) system on Units 1 and 2 and modified some of the conditions of original PSD-FL-084 for CO. The issued permit (DEP No. 0950137-015-AC/PSD-FL-395) is accessible at the following link:

http://www.dep.state.fl.us/air/emission/construction/ouc-stanton/final_permit.pdf

This project triggered review under the PSD rules for carbon monoxide (CO), this evaluation is accessible at the following link:

<http://www.dep.state.fl.us/air/emission/construction/ouc-stanton/TECHNICAL015.pdf>

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2. Fossil Fuel Steam Generators Units 1 and 2 Power Plant Siting Certification (PPS 81-14/SA1): On December 29, 1999, the FDEP issued the first Title V permit which includes permit limits for Beryllium (Be), lead (Pb) and fluorides based on the amended PPS certification No. PA 81-14/SA1. The issued permit (DEP No. 0950137-001-AV) is accessible at the following link:

<http://arm-permit2k.dep.state.fl.us/psd/0950137/00002719.pdf>

4. Combined Cycle Unit B (PSD-FL-373A): On May 12, 2008 the FDEP issued an air construction permit pursuant to the rules for the Prevention of Significant Deterioration of Air Quality (PSD) for Unit B. This permit authorized the construction of a nominal 300 megawatts (MW) natural gas-fueled combined cycle (NGCC) combustion turbine. The issued permit (DEP No. 0950137-020-AC/PSD-FL-373A) is accessible at the following link:

<http://www.dep.state.fl.us/air/emission/construction/ouc-stanton/FPERMIT373A.pdf>

The project triggered review under the PSD rules for particulate matter (PM/PM₁₀), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂) and visible emissions (VE). The Technical Evaluation and Preliminary Determination (TEPD), including determinations of Best Available Control Technology (BACT) for these pollutants are accessible at the following link:

<http://www.dep.state.fl.us/air/emission/construction/ouc-stanton/TECHNICAL373A.pdf>

4. CHANGES TO PERMITS.

This project is being processed as line-item changes to the previously issued permit specific conditions. They are generally highlighted in yellow (additions underlined or ~~striketrough~~ deletions) and will be removed upon issuance of the final permit.

- **Changes to PSD Construction Permits.**

The changes to permit Nos. 0950137-015-AC (PSD-FL-395) and 0950137-020-AC (PSD-FL-373A) are detailed in the enclosed draft permit No. 0950137-036-AC (PSD-FL-395A, PSD-FL-373B).

In general, the requested changes to the excess emissions provisions are acceptable based on the applicant's assurance that Unit B is not being used as a peaking unit. Over a typical 24-hour period, Unit B operates close to full capacity during the day and cycles down to about 70% capacity during the night. On average, the unit will perform one cold startup (following a shutdown of the steam turbine lasting at least 48 hours) and two warm startups (following a shutdown of the steam turbine lasting between 8 and 48 hours) per month. A clarification to provide the ability to rely upon the 2 hours of excess emissions resulting from a documented malfunction if a malfunction occurs during a startup period is also acceptable. The Department prefers that the permittee temporarily switch out of the startup mode excess emissions provisions and utilize the excess emissions provisions due to a malfunction if the malfunction can be resolved quickly, then complete the startup period, rather than extend the excess emissions by entering a shutdown mode and then restarting at a later time. Continuing with the existing startup period after resolving the malfunction could potentially avoid up to 7 additional hours of excess emissions due to an unnecessary shutdown and restarting of the unit.

The Department also encourages operators to keep their combustion turbines properly tuned to ensure that emissions during normal operations are as low as possible, so clarifications to the excess emissions provisions that encourage tuning are routinely granted.

Clarifications will be made to better define if and/or when compliance testing is required for operations on fuel oil; however, the requested change to reduce ammonia slip testing from an annual requirement to once every five years will not be granted as part of this project. Even though potential annual emissions of ammonia are less than 100 tons per year, annual testing to determine the ammonia slip level (and corresponding NO_x CEMS readings) was specifically imposed in the PSD permit to provide an indicator of catalyst viability and to maintain a correlation between the ammonia injection rate and actual NO_x emissions to be used as a surrogate parameter in the event the NO_x CEMS is temporarily out of service.

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The remainder of the changes that are detailed in the construction permit are related to clarifications based on the approved changes to the excess emissions provisions.

- **Changes to Power Plant Siting Certification.**

The requested changes to the Power Plant Site Certification No. PA 84-14/SA1 will need to be processed at the power plant siting program office.

- **Changes to Title V Permit.**

Changes to the current Title V air operation permit corresponding to the revisions authorized by this project will be detailed in the statement of basis for the Title V permit revision project, which will be issued as permit No. 0950137-037-AV under a combined public notice with the issuance of this construction permit.

5. PRELIMINARY DETERMINATION.

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Teresa Heron, is the project engineer responsible for reviewing the application and drafting the permit documents. Jonathan Holtom, P.E., is the Air Permitting Supervisor responsible for reviewing, editing and approving these documents. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT

PERMITTEE

Orlando Utilities Commission (OUC)
Post Office Box 3193
Orlando, Florida 32802

Authorized Representative:

Ms. Denise M. Stalls
Vice President, Environmental Affairs

Permit No. 0950137-036-AC (PSD-FL-395A, PSD-FL-373B)
Excess Emissions Revisions for Units 1, 2 and B
Expires: December 31, 2011

PROJECT AND LOCATION

This is the final air construction permit authorizing the modification of several specific conditions of permit Nos. 0950137-015-AC (PSD-FL-395) and 0950137-020-AC (PSD-FL-373A). The existing OUC Curtis H. Stanton Energy Center (the Stanton Plant) is located at 5100 South Alafaya Trail in Orlando, Orange County. The Universal Transverse Mercator (UTM) Coordinates are: Zone 17, 483.6 km East and 3151.1 km North. Latitude is: 28° 29' 17" North; and, Longitude is: 81° 10' 03" West.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

Changes to previously established permitting language is indicated by ~~strikethrough~~ formatting to indicate deletions and by double underline formatting to indicate new text in the draft version of this permit. The final permit will include final language without this formatting.

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 and as described in the application, approved drawings, plans, and other documents on file with the Department. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C.

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

Executed in Tallahassee, Florida

(DRAFT)

Michael P. Halpin, P.E., Director
Division of Air Resource Management

(Date)

SECTION I - GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Existing Facility

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

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

SECTION I - GENERAL INFORMATION

EU No.	Brief Description
022	General Purpose Engines
023	Helper Cooling Towers
024	Emergency Generators
027	Mechanical Draft Cooling Tower
036	Inline Insertable Dust Collector
040	Natural Draft Cooling Towers

Project Description

This proposed project is to modify several specific conditions of permit Nos. 0950137-015-AC (PSD-FL-395) and 0950137-020-AC (PSD-FL-373A).

This project modifies conditions for the following emissions units.

ID No.	Emission Unit Description
001	Fossil Fuel Fired Steam Electric 468 MW Generator No. 1
002	Fossil Fuel Fired Steam Electric 468 MW Generator No. 2
037	Stanton Unit B - 300 MW Combined Cycle Combustion Turbine

FACILITY REGULATORY CLASSIFICATION

- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by the Department in Rule 62-296.470, F.A.C.
- The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.
- The facility has units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility operates units that were certified under the Florida Power Plant Siting Act, 403.501-518, F.S.

RELEVANT DOCUMENTS

Several documents shown in the following link are not a part of this permit, but helped form the basis for this permitting action. Documents related to this permitting action are posted under permit No. 0950137-036-AC at the following web site address: <http://appprod.dep.state.fl.us/air/emission/apds/listpermits.asp>.

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address and phone number of the Central District Office are: Department of Environmental Protection, Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando Florida 32803-3767. Telephone: (407)894-7555. Fax: (407)897-5963.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary Terms;
 - b. Appendix B. General Conditions; and
 - c. 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, 62-214, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration: This permit does not authorize any physical construction. The expiration date is established to provide adequate time for the concurrently processed Title V air operation permit revision to be issued as a final permit. For good cause, the permittee may request that these PSD air construction permits be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, 62-210.300(1), and 62-212.400(6)(b), F.A.C.]
8. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Bureau of Air Regulation with copies to the Compliance Authority. NOTE: The required Title V air operation permit revision application is being processed concurrently with this air construction permit modification. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS

Subsection A. Emissions Units 1 and 2

This subsection of the permit addresses the following emissions units.

EU No.	EMISSION UNIT DESCRIPTION
001	Fossil Fuel Fired Steam Electric 468 MW Generator No. 1
002	Fossil Fuel Fired Steam Electric 468 MW Generator No. 2

APPLICABLE STANDARDS AND REGULATIONS

1. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
2. Except as specified below, the facility remains subject to all of the requirements contained in all previously issued air construction permits for this facility. (Note: These requirements are reflected in the Title V Air Operation Permit No. 0950137-029-AV. The last permit No. 0950137-031-AV inadvertently omitted the language of the low NO_x burners and overfire air project.)

PERMIT BEING MODIFIED: 0950137-015-AC (PSD-FL-395) - Low NO_x Burners and Overfire Air.

3. To provide periods of allowable excess emissions exclusions from the carbon monoxide continuous emissions monitoring data related to start up, shut down and malfunction, Specific Condition 9 of permit No. 0950137-015-AC (PSD-FL-395) is modified as follows:

9. Carbon Monoxide (CO):

Emissions of CO from Unit 1 shall not exceed 0.18 lb/~~mm~~MMBtu heat input on a 30-operating day rolling average as demonstrated by the required continuous emissions monitoring system (CO-CEMS); ~~E~~missions of CO from Unit 2 shall not exceed 0.15 lb/~~mm~~MMBtu heat input on a 30-operating day rolling average as demonstrated by the required CO-CEMS, excluding allowable periods of excess emissions related to startup, shutdown and malfunction. Emissions of CO shall not exceed these respective limits on a 3-hr average during the initial compliance demonstration. See Specific Condition **10.**

[62-210.200 (BACT), and 62-212.400(PSD), F.A.C.]

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS

Subsection B. Emissions Unit 037

This section of the permit addresses the following emissions units.

EU No.	EMISSION UNIT DESCRIPTION
037	Stanton Unit B - 300 MW Combined Cycle Combustion Turbine

APPLICABLE STANDARDS AND REGULATIONS

1. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
2. Except as specified below, the facility remains subject to all of the requirements contained in all previously issued air construction permits for this facility. (Note: These requirements are reflected in 0950137-020-AC (PSD-FL-373A) and the last Title V Air Operation Permit Revision No. 0950137-031-AV.)

PERMIT BEING MODIFIED: 0950137-020-AC (PSD-FL-373A) Combined Cycle Unit B -SECTION III – Subsection A.

3. To reduce the number of full hours that are exempted from the CEMS data due to allowable excess emissions deductions, to clarify how to treat data if a malfunction is experienced during a startup period, to avoid the need to wait up to 24 hours to restart a unit following an aborted startup due to a documented malfunction, and to recognize periods of excess emissions resulting from gas-to-oil in addition to oil-to-gas fuel switches, Specific Condition 18 of permit No. 0950137-020-AC (PSD-FL-373A) is revised as follows:

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 NO_x 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 NO_x and CO emissions from the CTG/HRSG system shall not exceed six hours (up to 360 minutes) in any 24 hour during the startup 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. *{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 NO_x and CO emissions shall not exceed four hours (up to 240 minutes) in any 24 hour during the startup 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.
 - c. CTG/HRSG System Hot Startup. For hot startup of the CTG/HRSG system, excess NO_x and CO emissions shall not exceed 2 hours (up to 120 minutes) during the startup 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.
 - d. Documented Malfunctions During Startup Periods. In the event that a documented malfunction occurs during a startup period, the excess emissions period for the startup may be extended for up to 2 additional hours (as provided above) for purposes of resolving the malfunction, as long as the excess emissions period due to a malfunction has not been previously consumed during the current 24-hour period.

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eg. Shutdown. For shutdown of the combined cycle operation, excess NO_x and CO emissions from the CTG/HRSG system shall not exceed three hours (up to 180 minutes) ~~in any 24-hour~~ during the shutdown period.

df. Fuel Switching. Excess NO_x and CO emissions due to oil-to-gas or gas-to-oil fuel switching shall not exceed ~~1-2 hours~~ (up to 120 minutes) each, respectively, in any a 24-hour block period.

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

4. To clarify that the beginning of ammonia injection is dependent upon the selective catalytic reduction (SCR) manufacturer's operating parameters rather than upon the combustion turbine manufacturer's operating parameters, Specific Condition 19 of permit No. 0950137-020-AC (PSD-FL-373A) is revised as follows:
 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]
5. To encourage proper tuning of the equipment in order to ensure that normal daily emissions are as low as possible, Specific Condition 20 of permit No. 0950137-020-AC (PSD-FL-373A) is revised as follows to provide additional allowances for excluding excess emissions during tuning sessions from the CEMS compliance demonstrations:
 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 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]
6. To clarify when VE testing is required and when compliance testing is required while burning fuel oil, Specific Condition 23 of permit No. 0950137-020-AC (PSD-FL-373A) is revised as follows:
 23. Annual Compliance Tests: During each federal fiscal year (October 1st, to September 30th) in which the combustion turbine unit operates for more than 400 hours, the CTG shall be tested to demonstrate compliance with the emission standard for visible emissions. NO_x 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 NO_x standards. Annual testing to determine the ammonia slip shall be conducted while firing the primary fuel. NO_x 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. If normal operation on fuel oil is less than 400 hours per calendar year, then annual compliance testing on fuel oil is not required for that year. [Rules 62-212.400 (BACT) and 62-297.310(7)(a)(4) & (8), F.A.C., and, Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.23]
7. To further clarify CEMS data collection requirements and data exclusion provisions for periods of allowable excess emissions, Specific Condition 27 of permit No. 0950137-020-AC (PSD-FL-373A) is revised as follows:

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27. CEMS Data Requirements.

- 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 NO_x 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, DLN tuning, or fuel switching subject to the provisions of Conditions 19 and 20 of this section will exclude the one-minute average data corresponding to emissions in excess of the emissions limiting standards during 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 NO_x 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 Conditions 18 and 20 of this section. 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

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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.]

8. To clarify how periods of excess emissions shall be reported, Specific Condition 33 of permit No. 0950137-020-AC (PSD-FL-373A) is revised as follows:

33. Excess Emissions Reporting.

- a. *Malfunction Notification.* If emissions in excess of a standard (subject to the specified averaging period) occur due to malfunction, the permittee shall notify the Compliance Authority within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident.
- 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 NO_x 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, fuel switching and DLN tuning shall be monitored, recorded and reported as excess emissions when emission levels exceed the standards specified in this permit for those hourly periods during which they occur and not for the entire averaging period. These hourly excess emissions periods shall then be excluded from the block averages calculated to demonstrate compliance with the emissions limits specified within 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.
- c. *NSPS Semi-Annual Excess Emissions Reports.* Within thirty (30) days following each calendar semi-annual period, the permittee shall submit a report on any periods of excess emissions that occurred during the previous semi-annual period to the Compliance Authority.

{Note: If there are no periods of excess emissions as defined in NSPS Subpart KKKK, a statement to that effect may be submitted with the SIP Quarterly Report to suffice for the NSPS Semi-Annual Report.}

[Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C., and 40 CFR 60.7, and 60.332(j)(1); and, Permit No. 0950137-020-AC/PSD-FL-373A, Specific Condition A.33]

SECTION 4. APPENDICES

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Citation Formats and Glossary of Common Terms

CITATION FORMATS

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

Old Permit Numbers

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

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

New Permit Numbers

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

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

PSD Permit Numbers

Example: Permit No. PSD-FL-317

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

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

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

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 result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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.]

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

SECTION 4. APPENDIX C

Common Conditions

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 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

SECTION 4. APPENDIX C

Common Conditions

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 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.]

SECTION 4. APPENDIX C

Common Conditions

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.
- (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.]

Friday, Barbara

To: Stalls, Denise M.
Cc: dbaez@ouc.com; sosbourn@golder.com; Shine, Caroline; 'Kathleen Forney'; Ana Oquendo; Gibson, Victoria; Heron, Teresa; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV
Attachments: 0950137036AC037AVSignedWrittenNoticeofIntent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air 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).

Attention: Teresa Heron

Owner/Company Name: ORLANDO UTILITIES COMMISSION
Facility Name: STANTON ENERGY CENTER
Project Number: 0950137-036-AC/0950137-037-AV
Permit Status: DRAFT CONSTRUCTION-DRAFT/PROPOSED TITLE V
Permit Activity: REVISION
Facility County: ORANGE

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.036.AC.D_pdf.zip

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.037.AV.D_pdf.zip

"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://appprod.dep.state.fl.us/air/emission/apds/default.asp>.

Permit 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.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)717-9095

Friday, Barbara

From: Microsoft Exchange
To: 'Stalls, Denise M.'; dbaez@ouc.com
Sent: Tuesday, June 14, 2011 1:53 PM
Subject: Relayed: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'Stalls, Denise M.'

dbaez@ouc.com

Subject: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Stalls, Denise M. [DStalls@ouc.com]
Sent: Thursday, June 16, 2011 8:47 AM
To: Friday, Barbara
Subject: RE: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Received, Thank you.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Tuesday, June 14, 2011 1:51 PM
To: Stalls, Denise M.
Cc: Baez, David R.; sosbourn@golder.com; Shine, Caroline; Kathleen Forney; Ana Oquendo; Gibson, Victoria; Heron, Teresa; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air 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).

Attention: Teresa Heron

Owner/Company Name: ORLANDO UTILITIES COMMISSION
Facility Name: STANTON ENERGY CENTER
Project Number: 0950137-036-AC/0950137-037-AV
Permit Status: DRAFT CONSTRUCTION-DRAFT/PROPOSED TITLE V
Permit Activity: REVISION
Facility County: ORANGE

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.036.AC.D_pdf.zip

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.037.AV.D_pdf.zip

"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://approd.dep.state.fl.us/air/emission/apds/default.asp>.

Permit 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

Friday, Barbara

From: Baez, David R. [DBaez@ouc.com]
To: Friday, Barbara
Sent: Wednesday, June 22, 2011 9:27 AM
Subject: Read: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message was read on Wednesday, June 22, 2011 9:27:02 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Osbourn, Scott [Scott_Osbourn@golder.com]
To: Friday, Barbara
Sent: Tuesday, June 14, 2011 1:53 PM
Subject: Read: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message was read on Tuesday, June 14, 2011 1:52:58 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Walker, Elizabeth (AIR); Shine, Caroline; Heron, Teresa
Sent: Tuesday, June 14, 2011 1:52 PM
Subject: Delivered: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message has been delivered to the following recipients:

Walker, Elizabeth (AIR)

Shine, Caroline

Heron, Teresa

Subject: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Walker, Elizabeth (AIR)
To: Friday, Barbara
Sent: Tuesday, June 14, 2011 2:19 PM
Subject: Read: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message was read on Tuesday, June 14, 2011 2:18:40 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Heron, Teresa
To: Friday, Barbara
Sent: Tuesday, June 14, 2011 1:52 PM
Subject: Read: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message was read on Tuesday, June 14, 2011 1:51:40 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: *Holtom, Jonathan; Gibson, Victoria*
Sent: Tuesday, June 14, 2011 1:52 PM
Subject: Delivered: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A, PSD-FL0373B) and 0950137-037-AV

Your message has been delivered to the following recipients:

Holtom, Jonathan

Gibson, Victoria

Subject: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A, PSD-FL0373B) and 0950137-037-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Tuesday, June 14, 2011 2:53 PM
Subject: Read: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message was read on Tuesday, June 14, 2011 2:52:30 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, June 14, 2011 1:55 PM
Subject: Read: ORLANDO UTILITIES COMMISSION - STANTON ENERGY CENTER - 0950137-036-AC(PSD0FL395A,PSD-FL0373B) and 0950137-037-AV

Your message was read on Tuesday, June 14, 2011 1:55:08 PM (GMT-05:00) Eastern Time (US & Canada).