



ENVIRONMENTAL PROTECTION DIVISION

Lori Cunniff, *Manager*

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December 8, 2006

CERTIFIED MAIL RECEIPT NUMBER: 7004 2510 0002 0975 7355 BUREAU OF AIR REGULATION

Mr. Alvaro Linero, P.E.
Professional Engineering Administrator, Air Permitting South
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Subject: Intent to Issue Construction Permit, Draft Construction Permit, and Technical Evaluation and Preliminary Determination for Stanton Energy Center Units 1 and 2, Dated November 22, 2006

Dear Mr. Linero:

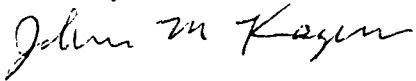
Below are the Orange County Environmental Protection Division (EPD) comments after reviewing the subject information.

1. This project adds NOx control equipment to existing coal-fired boilers, which Orlando Utilities Commission (OUC) committed to do when applying for a permit for Unit B. This equipment is required for OUC to net out of PSD permitting requirements for NOx for Unit B. The NOx control equipment will also be required for OUC to meet the low NOx emission limits of the Clean Air Interstate Rule (CAIR), which becomes effective before Unit B is built. The neural networked-based combustion optimization system NOx control equipment proposed for this project was not one of the options listed for consideration in the OUC letter of May 10, 2006 requesting to net out of PSD. That letter implied that Unit 1 would likely be upgraded with NOx controls similar to Unit 2, though no final decisions had been made.
2. This permit and technical evaluation are written as if Units 1 and 2 were identical. As you know, Units 1 and 2 differ significantly in NOx control systems and NOx and SO₂ emission rates. Unit 2 has low-NOx burners and a selective catalytic reduction (SCR) system, while Unit 1 has no NOx control. The actual NOx and SO₂ emission rates for the two units differ by a factor of more than 2. EPD believes that Unit 1 should be upgraded to the same configuration as Unit 2 as quickly as possible, to improve the county's air quality and meet CAIR's 2009 effective date for NOx. This would likely require an expensive SCR system, other modifications such as a low-NOx burner with an improved control system, and upgrades to the existing flue gas desulfurization system. However, these changes would result in significant reductions in NOx and SO₂ emission rates

likely to meet CAIR requirements. The changes proposed appear likely to yield relatively small improvements in Unit 1 emissions, not the significant improvements needed by 2009.

Drafting permit language is beyond OCEPD's Specific Operating Agreement contractual commitments, and we will defer to the Department and EPA for rule interpretation. If you have any questions or comments, please call me at (407) 836-1443 or e-mail me at John.Kasper@ocfl.net.

Sincerely,



John M. Kasper, P.E.
Engineer III



(4) JK/JD/HP:na

c: Lori Cunniff, Manager, Orange County EPD
Hamp Pridgen, Air Program Administrator, Orange County EPD