



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

Certified Mail -- Return Receipt Requested

July 9, 2004

Mr. Frederick F. Haddad, Jr.  
Vice President  
Power Resources Business Unit  
Orlando Utilities Commission  
500 South Orange Avenue  
P.O. Box 3193  
Orlando, Florida 32802

Re: **DRAFT Title V Permit Renewal No. 0970137-006-AV**  
**Curtis H. Stanton Energy Center**

Dear Mr. Haddad, Jr.:

We have begun the review of your recent application for renewal of the Title V Permit for this facility. However, we must deem your application *incomplete*, because we need further information relative to the compliance assurance monitoring (CAM) plan included with the application. Specifically, the following comments/questions are a result of our review of the submitted CAM plan for the electrostatic precipitator (ESP) for particulate matter (PM) emissions control for the two boilers at the facility.

- As you indicate in your application, Emission Units 1 and 2 are subject to CAM for PM emissions controlled by an ESP. Because the continuous opacity monitoring system (COMS) is required to be used at the facility (for Phase II Acid Rain Program purposes), it must also be used as part of the CAM plan. Unfortunately, we have found that a direct linear correlation between opacity and actual PM emissions is typically not achievable.
- The selected opacity indicator range specified (i.e., an hourly average opacity less than 15%) appears to be high based on the information submitted with the application. In order to demonstrate a linear correlation, and justify your choice, please provide additional historical test data showing the actual PM emissions rate during each test run, and the highest opacity recorded during the same test run.
- If a direct linear relationship cannot be clearly demonstrated, a second indicator must be established. If a second indicator is needed, please provide test data showing the linear correlation between tested PM emissions levels and ESP total power. Our research shows that ESP total power typically provides a much better correlation with PM than opacity and thus could be used in addition to the COMS.

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- All test data provided should be for a minimum of five years.
- Please provide an updated Phase II Acid Rain Part Application with a current Designated Representative signature for the two combined-cycle combustion turbines.
- Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526.

Sincerely,



A. A. Linero, P.E.  
Program Administrator  
Permitting South Section

Cc: Ms. Denise M. Stalls, OUC  
Len Kozlov, P.E., Central District Office

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Mr. Frederick F. Haddad, Jr.  
 Vice President  
 Power Resources Business Unit  
 Orlando Utilities Commission  
 500 South Orange Avenue  
 Post Office Box 3193  
 Orlando, Florida 32302

2. Article Number

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