State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee				
То:	Loctn.:			
To:	Loctn.:			
To:	Loctn.:			
From:	Date:			

ST. JOHNS RIVER DISTRICT

TO:

Hamilton S. Oven, Jr.

OSJ-82-091

THROUGH

A. Senkevich

THROUGH:

T. Hunnicutt 7

FROM:

C. Collins CmC

DATE:

January 12, 1982

SUBJECT:

OUC/Curtis H. Stanton Energy Center Staff Analysis Report

As requested, I have completely reviewed the report and found it very well written and comprehensive.

The following are our suggested recommendations and comments:

- 1. On page 0156 change southwest to southeast.
- 2. Page 4 typographical error item 15 "oilt".
- 3. Page 5 Designate OUC as the party responsible for the monitoring of the air so they don't feel that Orange County Pollution Control Program has the obligation. If any quality control measures are required by the Bureau of Air Quality Management, please spell it out here.
- 4. Page 5-B-5.- Add Expansion or modification expenses to be borne by the applicant.
- 5. Page 6-C-1. Change to "Within thirty (30) days after achieving."
- 6. Page 7 As the Iron Bridge STP will have AWT sewage effluent, why allow the use of secondary treatment effluent? Why not state the best treatment available from Iron Bridge or state AWT?
- Page 11, IV A. Clarify .3 MGD on a daily basis, averaged over a 12 month period.
- 8. Page 12 E. Are we stating, if there is an emergency water shortage they can't withdraw any water? They surely will object.
- 9. Page 16, D. Add for review... "and approval" prior to.

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OUC Staff Report

VI. FACILITY SPECIFIC CONCERNS

- A. Air Quality
- 1. Selected Fuel

The Stanton Energy Center is planned for coal-fired operation. Based on a study of availability of Eastern coals, there are practical sources of coal adequate to meet the plant's needs (approximately 1,000,000 tons per year per unit) over the anticipated life of the project. The OUC coal availability study identified coal supplies in Illinois and Appalachia as the most likely sources.

The plant is designed to retain the flexibility to change its coal supply (to insure against disruptions in supply and local market upsets and to maintain competitive prices) with a minimum reduction in efficiency and without violating air quality standards. Analyses of potential coal supplies were carried out so that the plant could be designed to accommodate coals with a variety of characteristics.

Coals from the above sources were analyzed to determine the ranges of characteristics and chemical constituents.

The air quality control system for Unit No. 1 is designed on a "worst case" basis assuming a high sulfur (3.8 percent) and ash (10 percent) content in the coal and a minimum heating value (11,000 Btu/lb). This approach assumes the sulfur and ash contents of the coal are 7.34 lb/MMBtu (million Btu) and 8.52 lb/MMBtu, respectively. The ash remaining after the coal is burned is assumed to be 80 percent fly ash and 20 percent bottom ash. The above values

DEPARTMENT OF ENVIRONMENTAL REGULATION

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Tables 3-3a
SITE CERTIFICATION EMISSION LIMITATIONS FOR BOILER EXHAUST GASES

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	Creston Generation Station Unit 1		Stanton Energy Center Unit 1	
Pollutant	Emission Limitation	Averaging Criterion	Emission Limitation	Averaging Criterion
Sulfur Dioxide	Maximum of 1140 lb SO ₂ /hr per unit	24-hour rolling average		
	4560 lb SO ₂ /hr (plant wide)			
	Maximum of 0.220 lb SO ₂ /10 ⁶ BTU	30-day rolling average	Maximum of 1.20 lb SO ₂ /10 ⁶ BTU Maximum of 1.14 lb SO ₂ /10 ⁶ BTU	2-hour average 3-hour average
6	40 CFR 60.43a(a)(2) NSPS requires a minimum of 70% SO ₂ removal	30-day rolling average		
Oxides of Nitrogen (NO _x)	0.50 lb/10 ⁶ BTU (for sub-bituminous coal)	30-day rolling average	0.6 lb/10 ⁶ BTU for all coals	30-day rolling averag
	0.60 lb/l0 ⁶ BTU (for bituminous coal)	30-day rolling average		
Fluorides	1.15 lb/hr (per unit)	Calendar year average	No limitations	
Sulfuric Acid Mist	80.9 lb/hr (per unit)	Calendar year average	No limitations	

Site Certification Emission Limitations for Boiler Exhaust Gases (continued)

Pollutant	Creston Generation Station Unit 1		Stanton Energy Center Unit 1	
	Emission Limitation	Averaging Criterion	Emission Limitation	Averaging Criterion
Particulate Matter (PM) from Main Stacks	99% or greater PM removal	During performance test		
	0.030 lb/10 ⁶ BTU (per unit)	During performance test	0.030 lb/10 ⁶ BTU 124.1 lb/hour	
	Opacity value to be determined from performance test data. Maximum not to exceed 20% opacity <u>b</u> /	6 minute average	Opacity not to exceed 20% except for one 6-minute period per hour of not more than 27% opacity	6-minute average
Carbon Monoxide (CO)	332 lb/hr (per unit)	During performance test	No limitations	ŧ
Volatile Organic Compounds (VOC)	3.32 lb/hr (per unit)	During performance test	No limitations	
Lead (Pb)	0.27 lb/hr (per unit)	Calendar year average	No limitations	
Beryllium (Be)	0.02 lb/hr (per unit)	Calendar year average	No limitations	
Mercury (Hg)	0.03 lb/hr (per unit)	Calendar year average	No limitations	