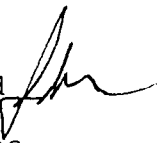


State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

## INTEROFFICE MEMORANDUM

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TO: Terry Cole

FROM: Steve Smallwood 

DATE: February 2, 1982

SUBJ: BAQM Comments on OUC Stanton Energy Center, Conditions of Certification and Staff Analysis Report

### Conditions of Certification

Prior to full concurrence with the January 1982 conditions of certification for Unit No. 1 we feel that several issues should be further defined. Detailed comments follow.

The emission limitations of section A paragraph 1 follow from 40 CFR 60 (Subpart Da). It is our understanding that OUC has objected to both the SO<sub>2</sub> limits of a. and the CO limits of e. The SO<sub>2</sub> limitation was based on the 90% reduction from the worst case design for Illinois Basin unwashed coal of 10900 BTU/lb. with 3.5% S and 11300 BTU/lb with 4% S. The 10813 BTU/lb. with 4.46% resulting in .83 lb/MMBTU cited in B. E. Shoup to H. S. Oven letter of October 29, 1981 was brought in later. EPA in a similar situation on TECO Big Bend #4 disallowed this type of request.

The CO limitation was based on figures contained in OUC's original application. That figure was withdrawn when the boiler manufacturer would not offer a guarantee. Subpart Da does not contain a CO limitation.

Paragraphs 3c and 5 disagree on opacity limits from storage piles and handling equipment. BAQM feels that with proper wetting and housekeeping, 5% opacity should be attainable and was specified as BACT.

Paragraph 4 limits emissions from flyash handling to 0.2 lb/hr. Since the system is required to be enclosed and vented through a fabric filter, BAQM feels that an opacity limit of 5% should suffice for compliance.

BAQM suggests that paragraph 12 be rewritten as follows:

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The flue gas scrubber shall be in service during startup and shutdown when No. 6 fuel oil is being burned. At all other times except malfunction as provided in 40 CFR 60.46a. the emission limits when burning No. 6 fuel oil shall be 0.80 lb/MMBTU for SO<sub>2</sub> and 0.03 lb/MMBTU for particulate matter.

Paragraph 13 is redundant. We recommend deletion of it and retention of paragraph 14 as written.

The stack monitoring devices required in paragraph B.1. are in accordance with 40 CFR 60.47a. The report "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls" should be informational and not included by reference as a requirement.

The post-construction ambient monitoring referred to in paragraphs B.2., B.5. & D.2. is not required under PSD rules. BAQM feels that unless the ambient data are required for a specific purpose, the requirement should be deleted.

#### Staff Analysis Report

We have reviewed Section VI. A. (Facility Specific Concerns-Air Quality) of the staff analysis report. Since this section has been assembled from several unrelated documents (the State BACT determination, the draft federal PSD permit, the JEA analysis, etc.), it is not well organized and contains some technical errors. We are returning a marked-up copy of this section indicating the corrections we suggest to the Power Plant Siting Section.