



July 15, 2010

Mr. David Read  
Special Projects Section  
Bureau of Air Regulation  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

RECEIVED 09389644

JUL 16 2010  
BUREAU OF  
AIR REGULATION

RE: **STANTON ENERGY CENTER  
MINOR SOURCE AIR CONSTRUCTION PERMIT NO. 0950137-028-AC  
TEMPORARY SHORT-TERM TEST BURN OF CHEM-MOD™ COAL ADDITIVE PROJECT**

*0950137 - 035-AC*

The Florida Department of Environmental Protection (FDEP) issued Air Construction Permit No. 0950137-028-AC to the Orlando Utilities Commission (OUC) in order to test the efficacy of a coal additive for flue gas NOx concentration reduction. The permit was approved by the FDEP on December 28, 2009, with an expiration date of June 30, 2010.

Section 3, Specific Condition 6 of the subject permit, requires that OUC complete the test within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal. OUC applied the fuel additive for the first time on December 29, 2009, and then conducted two test applications on January 21-22, 2010 and February 20-26 2010 respectively. The modified fuel has only been burned on Unit 1. Subsequently, Unit 1 went into a turbine outage on February 26, 2010 and returned to operation on May 3, 2010.

In order to complete a more comprehensive testing program, OUC had previously requested an extension of the permit expiration date from June 30, 2010 to July 30, 2010. However, due to climatic conditions, outage and tuning schedule changes, OUC has not been able to conduct the test application of the fuel additive as previously planned after the outage of Unit 1.

Consequently, OUC requests that Specific Condition 6, Section 3 of the subject permit, and the permit expiration date be modified to allow for a testing schedule through the end of the 2010 calendar year. The suggested wording is "Test Duration: The test shall be limited to no more than ninety (90) days of fuel additive application to the coal." The permit expiration date extension requested is to December 31, 2010. This permit revision would allow OUC to conduct a more representative test of the Chem-Mod™ Solution fuel additive performance. The actual target date to complete the testing would be September 27 through November 7, 2010.

Enclosed are an original and three copies of the associated application forms. OUC would appreciate your timely processing of the application, as the current test burn approval is due to expire on July 30, 2010. Please contact me at (813) 287-1717 if you have any questions.

Sincerely,

**GOLDER ASSOCIATES INC.**

Scott Osbourn, PE  
Associate and Senior Consultant



Golder Associates Inc.  
5100 W. Lemon Street, Suite 208  
Tampa, FL 33609 USA  
Tel: (813) 287-1717 Fax: (813) 287-1716 www.golder.com



Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America

Enclosure

Cc: Caroline Shine, DEP Central District  
Garfield Blair, OUC

SO/DL/ev



# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

**To ensure accuracy, please see form instructions.**

#### Identification of Facility

1. Facility Owner/Company Name: <b>Orlando Utilities Commission</b>	
2. Site Name: <b>Stanton Energy Center</b>	
3. Facility Identification Number: <b>0950137</b>	
4. Facility Location... <b>Stanton Energy Center</b> Street Address or Other Locator: <b>5100 South Alafaya Trail</b> City: <b>Orlando</b> County: <b>Orange</b> Zip Code: <b>32193</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>David R. Baez</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Orlando Utilities Commission</b> Street Address: <b>P.O. Box 3193</b> City: <b>Orlando</b> State: <b>FL</b> Zip Code: <b>32802</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(407) 434 - 3072</b> ext. Fax: <b>(407) 244 - 8794</b>	
4. Application Contact E-mail Address: <b>dbaez@ouc.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

## APPLICATION INFORMATION

### Purpose of Application

**This application for air permit is being submitted to obtain: (Check one)**

#### **Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

#### **Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

## APPLICATION INFORMATION

This application is for a minor source air construction permit for SEC Units 1 and 2 to allow for a test burn of a coal additive. The additive, referred to as the Chem-Mod™ Solution, is a dual injection sorbent system in which two chemicals are injected on the coal feed belt, before the coal combustion process, to reduce emissions.

In order to complete a more comprehensive testing program, OUC had previously requested an extension of the permit expiration date from June 30, 2010 to July 30, 2010. However, due to climatic conditions, outage and tuning schedule changes, OUC has not been able to conduct the test application of the fuel additive as previously planned after the outage of Unit 1.

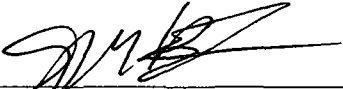
Consequently, OUC requests that Specific Condition 6, Section 3 of the subject permit, and the permit expiration date be modified to allow for a testing schedule through the end of the 2010 calendar year. The suggested wording is "Test Duration: The test shall be limited to no more than ninety (90) days of fuel additive application to the coal." The permit expiration date extension requested is to December 31, 2010. This permit revision would allow OUC to conduct a more representative test of the Chem-Mod™ Solution fuel additive performance. The actual target date to complete the testing would be September 27 through November 7, 2010.



## APPLICATION INFORMATION

### Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : <b>Garfield Blair, Director, Environmental Affairs</b>
2. Owner/Authorized Representative Mailing Address... <b>P.O. Box 3193, Orlando FL 32802</b> Organization/Firm: <b>Orlando Utilities Commission</b> Street Address: <b>Reliable Plaza, 100 West Anderson</b> City: <b>Orlando</b> State: <b>FL</b> Zip Code: <b>32801</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(407) 434 - 4288</b> ext. Fax: <b>(407) 275 - 4120</b>
4. Owner/Authorized Representative E-mail Address: <b><u>gblair@ouc.com</u></b>
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature  <u>07/14/2010</u> Date

## APPLICATION INFORMATION

### Application Responsible Official Certification


**Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."**

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
5. Application Responsible Official E-mail Address:
6. Application Responsible Official Certification: <p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p>_____ Signature</p> <p>_____ Date</p>



**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Scott H. Osbourn, Senior Consultant</b> Registration Number: <b>57557</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates, Inc.**</b> Street Address: <b>5100 West Lemon Street, Suite 208</b> City: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(813) 287-1717</b> ext. <b>53304</b> Fax: <b>(813) 287-1716</b>
4. Professional Engineer E-mail Address: <b><u>sosbourn@golder.com</u></b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature: <u></u> Date: <u>7/15/10</u> (seal)

\* Attach any exception to certification statement. \*\* Board of Professional Engineers Certificate of Authorization #0000016

