



April 13, 2009

Michael P. Halpin, P.E., Administrator
Office of Siting Coordination
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-2400

Re: OUC / Southern Company Stanton Unit A;
Amendment of Supplemental Site Certification Application;
Emergency Generator
PA81-14

Dear Mr. Halpin:

On behalf of Southern Company, the Orlando Utilities Commission (OUC) proposes to amend the Site Certification Application for the Stanton Unit A combined cycle unit. The amendment is to add a nominal 500 kW emergency generator to support the operation of Stanton Unit A. This request is submitted pursuant to Section 403.5113, Florida Statutes (F.S.) and Rule 62-17.205, Florida Administrative Code (F.A.C.). Southern believes that this "material change to the application" for Stanton Unit A can be undertaken in accordance with the existing Conditions of Certification for Stanton Unit A. The only permitting requirement for this emergency generator is a future amendment to the facility's federally-required Title V air operating permit to add the generator as an insignificant emissions unit. No air construction permitting is required for this generator.

The new emergency generator will be located within the existing power block area for Stanton Unit A. The location of the proposed emergency generator is shown on the attached site plans for Stanton Unit A as contained in the original Supplemental Site Certification Application. The construction of the emergency generator can be undertaken in accordance with the existing General Conditions, Part IV and Construction Conditions, Part V of the Stanton Conditions of Certification. Further, the existing stormwater system that serves Stanton Unit A can accommodate the area to be occupied by the emergency generator. The installation of a concrete foundation for the emergency generator will only result in a de minimus increase of impervious area that will not affect the quantity or quality of stormwater discharge above current conditions. The electrical generator is located in an already disturbed area of the site and contains no natural resources, such as wetlands or natural habitat that might be used by threatened or endangered wildlife species. The emergency generator does not require use of the cooling tower; therefore it

ORLANDO UTILITIES COMMISSION

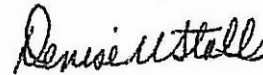
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will not increase cooling water makeup or change the cooling tower discharges or other plant wastewaters in any way. The project will not result in an increase in the use of groundwater as authorized under the existing Conditions of Certification. Diesel fuel for the generator will be stored in a 850 gallon dual wall sub-base UL142 compliant tank. Orange County has been notified of the proposed tank and the FDEP storage tank registration form will be submitted within the required timeframe, per Chapter 62-762.401, F.A.C. The emergency generator will not add any new employees or other onsite facilities. Therefore, there will be no off site impacts to public facilities, such as roads as a result of this new generator. Southern will also comply with the applicable Florida Department of Transportation and Orange County regulations when transporting materials and equipment to the Stanton site for purposes of installing this generator.

Accordingly, OUC requests that the Department issue a letter confirming that this addition of the 500 kW emergency generator constitutes an amendment to the Stanton Unit A Site Certification Application.

Should you have any questions concerning this matter, please do not hesitate to contact Joseph Miller of Southern Power FL at 321.235.2421.

Sincerely,



Denise M. Stalls,
Vice President
Environmental Affairs
OUC, The Reliable One

DMS:rc
Encls.

cc: Toni Sturtevant, Esq., FDEP
All Parties of Record for OUC/Southern – Florida LLC Stanton Unit A Site Certification

CERTIFICATE OF SERVICE

CC by email (received receipt requested).

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