Appendix CP-1, Compliance Plan for Natural Gas Compliance Testing

In accordance with Rule 62-213.440(2), Florida Administrative Code (F.A.C.), this compliance plan is being issued as a part of the Title V permit renewal for the Lakeland Electric Winston Peaking Station, located at 1200 Airport Road, Lakeland, Polk County. It is being issued to ensure that the permitted emissions limits for EU Nos. 001 – 020 for nitrogen oxides (NO_X), visible emissions and ammonia are not exceeded while combusting natural gas.

The twenty internal combustion engines are permitted to operate while firing natural gas; however, natural gas is not currently available at the site. The initial performance tests to demonstrate compliance with the emission standards specified in this permit for periods of natural gas combustion shall be conducted within 60 days after achieving at least 90% of permitted capacity, but not later than 180 days after initial operation of any of the emissions units combusting natural gas. Initial performance tests shall be conducted for NO_X and visible emissions on a sample of 5 (five) randomly picked internal combustion engines for the first year after natural gas combustion commences. A different set of randomly picked five engines from the remaining internal combustion engines will be tested during each subsequent year of operation until all of the engines have completed the initial performance test while combusting natural gas. An initial performance test shall be conducted for ammonia slip on only one internal combustion engine within 60 days after achieving at least 90% of permitted capacity, but not later than 180 days after initial operation of any of the emissions units combusting natural gas.

Results of the above tests shall be submitted to the Compliance Authority within 45 days of completion of the tests.

If the above milestones are not met (i.e., testing not completed within 60 days after achieving at least 90% of permitted capacity, but not later than 180 days after initial operation of any of the emissions units combusting natural gas; tests results not submitted within 45 days; etc.), the source shall notify the Compliance Authority in writing, within 15 days after the milestone has passed, to include the achievement of compliance, of progress achieved, requirements met, requirements not met, corrective measures adopted and an explanation of any measures not met by the completion date for the milestone or for compliance. All reports shall be accompanied by a certification, signed by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.

The requirements of this compliance plan shall remain in effect until the required initial tests have been completed and the results of said tests have been submitted to, and approved by, the Compliance Authority.

[Rule 62-213.440(2), F.A.C.]