LAKELAND ELECTRIC

**Farzie Shelton, chE; REM**

Environmental Affairs Manager of Licensing & Permitting

RECEIVED

APR 28 2000

BUREAU OF AIR REGULATION

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 21, 2000

Mr. Clair Fancy P.E
Chief of the Bureau of Air Management
Division of Air Resources Management
Florida Department of Environmental Protection
111 S. Magnolia
Suite 4
Tallahassee, Fl 32301

Dear Mr. Fancy:

**Re: Draft Air Construction Permit, DEP File No. PSD-FL-166© and 1050003-007-AC**
**City of Lakeland, Department of Electric Utilities**
**Charles Larsen Memorial Power Plant – Inlet Fogger**

We are in receipt of your letter dated April 13, 2000 and attached Draft Air Construction Permit , Technical Evaluation and Preliminary Determination, and Public Notice of Intent to Issue Air Construction Permit for the above referenced project.

Pursuant to Section 403.815, Florida Statutes and DEP Rule 62-103.150, F.A.C., on April 19, 2000 we published the "Public Notice of Intent to Issue Air Construction Permit " in the Lakeland Ledger. Therefore, enclosed please find Affidavit of Publication confirming publication of the Department's notice.

If you should have any questions, please do not hesitate to contact me.

Sincerely

Farzie Shelton

Enclosure

CC: SWD
EPA
T. Heron, BAR

**City of Lakeland ● Department of Electric Utilities**

**501 East Lemon Street ● Lakeland, Fl 33801-5050 ● (863) 834-6603 ● Fax (863) 603-6335 ● Message System 834-6592**

# AFFIDAVIT OF PUBLICATION
## THE LEDGER
## Lakeland, Polk County, Florida

**Case No .....**

**STATE OF FLORIDA)**
**COUNTY OF POLK)**

Before the undersigned authority personally appeared Nelson Kirkland, who on oath says that he is Classified Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

..Notice.of.Intent.to.Issue.Air.Construction.Permit.....

.....

in the matter of.....DEP.File.No..1050003-007-AC.(PSD-FL-166C).....

.....

.....

in the.....

.....

Court, was published in said newspaper in the issues of.....

..4-19;2000.....

.....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed.....
Nelson Kirkland
Classified Advertising Manager
Who is personally known to me.

Sworn to and subscribed before me this.....30th.....
day of.....April..... A.D. 20.....00.....

Jennifer L. Clendening
Notary Public
**JENNIFER L. CLENDENING**

JENNIFER L. CLENDENING
MY COMMISSION # CC 900938
EXPIRES: January 10, 2004
Bonded Thru Notary Public Underwriters

(Seal)

My Commission Expires.....1/10/04.....

253065 D917 Sue Trout

**Attach Notice Here**

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1050003-007-AC (PSD-FL-166C)

City of Lakeland, Department of Electric Utilities
Larsen Power Plant - Inlet Fogger Project
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to the City of Lakeland. The permit is to install foggers at the compressor inlet of a dual fired GE General Electric PG7111 EA combined cycle combustion turbine-electrical generator, identified as emission unit 008 at the Larsen Power Plant in Polk County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are: City of Lakeland, Department of Electric Utilities 501 E. Leon Street, Lakeland, Florida 33801-5079.

The combustion turbine, nominally rated at approximately 90 megawatts (MW) at 59 degrees when firing gas. This combustion turbine (exclusive of the steam cycle) normally achieves its maximum rated output of approximately 100 MW on cold (20 degrees) days because the greater compressor inlet air density allows greater throughput in the rotor or expansion section of the combustion turbine. The maximum power output is only about 80 MW on hot (90 degrees) days because of the lower compressor inlet air density. The foggers can increase hot-day power output (under very dry conditions) by as much as 6 MW per this combustion turbine, thus almost restoring the units to their nominal improvement of about 3 MW can be expected.

The foggers provide no benefit under humid or cold (less than approximately 50 degrees) conditions and will not be used when they occur. The maximum output of approximately 100 MW will continue to occur at low ambient temperature. The result is that maximum hourly emissions will not increase although actual annual emissions will increase within their permitted limits because more fuel will be used on hot, relatively dry days.

Although the number of days during which the foggers can economically operate limits emissions increases to levels below significance for the purposes of PSD applicability, the City calculated potential emissions based on year around operation to insure non-applicability. The City asserts and the Department accepts that the modification will not cause any meaningful change in the actual hours of operation of this combined cycle unit. The unit is allowed to operate continuously and already have a very high availability factor. The maximum increase in annual emissions caused by the project in tons per year is summarized below along with the PSD significant levels.

| Pollutants | Annual Emission Increase | PSD Significant Levels |
|---|---|---|
| $PM/PM_{10}$ | 1.32 | 25/15 |
| $SO_2$ | 7.43 | 40 |
| $NO_x$ | 13.21 | 40 |
| VOC | 0.44 | 40 |
| CO | 5.99 | 100 |

An air quality impact analysis was not required or conducted. No significant impacts are expected to occur as a result of this project. It will not cause or contribute to a violation of any ambient air quality standard or increment.

The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air construction permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known, (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding, and an explanation of how the petitioner's substantial interests will be affected by the agency determination, (c) A statement of how and when petitioner received notice of the agency action or proposed action, (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate, (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief, and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southwest District Office
3804 Coconut Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the application, technical evaluation, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

D-917 - 4-19; 2000

City of Lakeland
Power Production
3030 E. Lake Parker Drive
Lakeland, FL 33805

CERTIFIED

P 965 934 139

MAIL

RETURN RECEIPT REQUESTED

Mr. Clair Fancy P.E.
Chief of the Bureau of Air Mgmt.
Division of Air Resources Mgmt.
Florida Dept of Env. Prot.
111 S. Magnolia, Suite 4
Tallahassee, FL 32301

850
488-1344
Telephone

RETURN TO SENDER
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RETURN TO SENDER
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NMR
4/24
C1018

Resend Fed Exp 4/27/00

LAKELAND ELECTRIC

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