



Farzie Shelton, chE; REM

Manager of Environmental Affairs

November 3, 2003

Ms. Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

NOV 04 2003

BUREAU OF AIR REGULATION

Attention: Mr. A. A. Linero, P.E., Administrator New Source Review

**RE: DEP File No. PSD-FL-166(D) and 1050003-012-AC
Lakeland Electric, Charles Larsen Memorial Power Plant
Combined Cycle Unit 8 – Peak Mode Operation and Turbine Upgrade Project**

Dear Al:

We are in receipt of the Department's Draft Permit and Technical Evaluation and Preliminary Determination for the above referenced Unit. As per requirement of Chapter 50, Florida Statutes, we published the Public Notice of Intent in the Lakeland Ledger on Friday October 31, 2003. Therefore, enclosed please find proof of publication.

Additionally, we have reviewed the draft permit and have the following comments and request changes to this draft permit. We feel these changes to the permit would not change the emissions and therefore, do not change any of the information in the Public Notice.

1. Specific Condition 5 - The emissions for SO₂ in the permit application were based on 2 grains sulfur per 100 scf. In the table, under the SO₂ column, Peaking (gas) row, the "1" grain should be changed to "2". However, the 3.5 lb/hr is correct for 2 grains sulfur/100 scf. Additionally, to be consistent with the 2 grains sulfur/100 scf, in the Base load (gas) row the 0.0019 lb/MMBtu should be changed to 2 grains/100 scf. Also, the "2.1 lb/hr" should be changed to "3 lb/hr" to be consistent with the 2 grains sulfur per 100 scf. The other values are accurate.

2. Specific Condition 7 - The Title V Permit allows the use of EPA Method 7E. The condition should be changed to allow either Method 7 or 7E.

3. Specific Condition 10 - The original PSD permit and Title V have not required any testing for VOCs as long as the CO emission limit was met. The language in the original PSD should be added to this condition as the last

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City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • (863) 834-6603 • Fax (863) 834-8187 • Message System 834-6592

farzie.shelton@lakelandgov.net

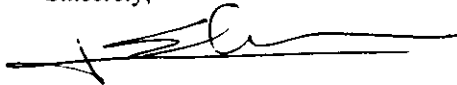
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sentence in the condition: *"Testing for VOCs is not required as long as the emissions of CO meet the limits specified in Specific Condition 5."*

As always, we appreciate your cooperation in this matter. If you should have any questions, please do not hesitate to call me.

Sincerely,



Farzie Shelton

Enclosures

cc: Ken Kosky P.E.

J. Heron

G. Kissel, SWD

G. Little, EPA

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AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Morgan Miller, 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 Permit

in the matter of DEP No. 105003-012-AC (PSO-FL-166D)

in the

Court, was published in said newspaper in the issues of

10-31-2003

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.

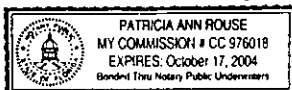
Signed.....

Morgan Miller
Classified Advertising Manager
Who is personally known to me.

Sworn to and subscribed before me this 31st

day of October A.D. 2003

Notary Public



(Seal)

My Commission Expires Oct. 17, 2004

J522 City of Lakeland

Attach Notice Here

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 105003-012-AC (PSO-FL-166D)
Lakeland Utilities, Charles Lansen Memorial Power Plant
Peak Mode Operation and Turbine Upgrade Project
Polk County, Florida

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Lakeland Electric. The permit will authorize peak mode operation and certain upgrades on the Unit No. 8 combustion turbine of the existing Charles Lansen Memorial Power Plant in Polk County, Florida. A new 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: Lakeland Electric, 501 E. Lemon Street, Lakeland, Florida 33801-5079.

The permit will allow the existing General Electric combustion turbine Model 7EA to operate in peak mode (roughly 104 percent of rated capacity) as originally designed though not previously authorized. Peak mode operation will be allowed for up to 3000 hours per year, although the actual operation in peak mode is likely to be minimal. During such time, the amount of water injected for nitrogen oxides (NO_x) control will be adjusted to maintain emissions at the previously permitted level of 25 ppmv corrected to 15% oxygen.

The separate upgrade project consists of installing a high pressure packing seal that regulates the flow of compressor discharge air between various internal components. This minimizes the amount of air required for cooling and increases the amount of air available for work in the cycle. The result is improved turbine performance in terms of output and heat rate with a small increase in emissions.

The emissions increases specifically related to the peak mode operation and the upgrades are estimated at 24 tons per year (TPY) of NO_x, 11.5 TPY of CO and minimal amounts of particulate matter, sulfur dioxide, or VOC. None of these increases exceeds the significant emission rates specified in Table 212.400-2, F.A.C., that would otherwise require a review for Prevention of Significant Deterioration (PSD) and a new BACT determination.

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 fourteen (14) days from the date of publication of "Public Notice of Intent to Issue Air Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station 4550S, 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 435, 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 the notice of intent. Petitions filed by any person 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 the 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 the 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; (c) 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; (d) A statement of how and when petitioner received notice of the agency action or proposed action; (e) A statement of all disputed issues of material fact, if there are none, the petition must so indicate; (f) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (g) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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 New Source Review Section 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Department of Environmental Protection Southwest District Office Air Resource Section 3804 Coconut Drive Tampa, Florida 33619-8218 Telephone: 813/744-6100 Fax: 813/744-6084
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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 Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

J522 - 10-31-2003