


Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer
THRU: Al Linero
FROM: Teresa Heron 
DATE: October 23, 2003
SUBJECT: City of Lakeland - Larsen Combined Cycle Unit No. 8
DEP File No. 1050003-012-AC / PSD-FL-166D

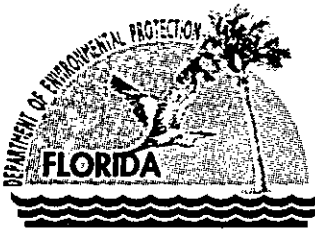
Attached is the draft public notice package for a project to add peak mode operation and turbine upgrades for combined cycle Unit No. 8 at the City of Lakeland's Charles Larsen Memorial Power Plant. The package includes the "Intent to Issue Air Permit", the "Technical Evaluation and preliminary Determination", and the "Draft Permit".

Annual emissions will increase because the heat rate through the units will increase during peak mode operation. However, the annual emissions increases will be below the PSD significant emission rates. Maximum short-term emissions (lb/hour) will increase slightly, but the emissions concentrations (ppmvd) will remain unaffected.

We recommend your approval and signature of this project.

AAL/th

Attachments



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

October 23, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy Bates, Director
Energy Supply
Lakeland Electric
501 E. Lemon Street
Lakeland, Florida 33801-5079

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

Dear Mr. Bates:

Enclosed is one copy of the "Draft Permit" and "Technical Evaluation and Preliminary Determination" for the above referenced project in Polk County. The Department's "Intent to Issue Air Construction Permit" and the "Public Notice of Intent to Issue Permit" are also included.

The "Public Notice" must be published one time only, as soon as possible, in the legal advertising section of a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any questions, please call Ms. Teresa Heron at 850/921-9529 or Mr. Linero at 850/921-9523.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/th

Enclosures

In the Matter of an
Application for Permit by:

Mr. Timothy Bates, Director
Energy Supply
City of Lakeland, Electric Utilities
501 E. Lemon Street
Lakeland, Florida 33801-5079

DEP File No. 1050003-012-AC
PSD Permit No. PSD-FL-166D
Charles Larsen Memorial Power Plant
Combined Cycle Unit No. 8
Peak Mode Operation and Turbine Upgrades
Polk County, Florida

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Lakeland Electric, applied on April 1, 2003 (complete on August 27, 2003), to the Department to authorize peak mode operation and to upgrade certain components of the Unit 8 combustion turbine at the Charles Larsen Memorial Power Plant in Polk County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210, and 62-212, F.A.C. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform proposed work. The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) and (11), F.A.C.

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 #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.

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, F.S. 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), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S. 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, F.A.C.

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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) 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, F.A.C. 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.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

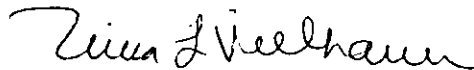
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the

Lakeland Electric
Charles Larsen Memorial Power Plant
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DEP File No. 1050003-012-AC
PSD Permit No. PSD-FL-166D
Unit 8 Peak Mode Operation/Turbine Upgrades

EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

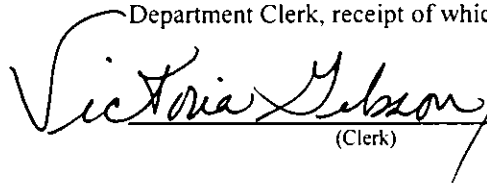
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Intent to Issue Permit" (including the Public Notice of Intent to Issue Permit", "Technical Evaluation and Preliminary Determination", and the "Draft Permit") was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/23/03 to the persons listed:

Timothy Bates, Lakeland Electric*
Farzie Shelton, Lakeland Electric
Ken Kosky P.E., Golder Associates
Gerald Kissel, DEP SWD
Jim Little, EPA Region 4 Office

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to §120.52, Florida Statutes, with the designated
Department Clerk, receipt of which is hereby acknowledged.

 October 23, 2003
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1050003-012-AC (PSD-FL-166D)

Lakeland Utilities, Charles Larsen 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 at the existing Charles Larsen 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 ppmvd 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 #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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) 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 Resources Section
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.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. Applicant

Lakeland Electric

501 E. Lemon Street

Lakeland, FL 33801-5079

Authorized Representative: Timothy Bates, Director of Energy Supply

2. Source Name and Location

Lakeland Electric

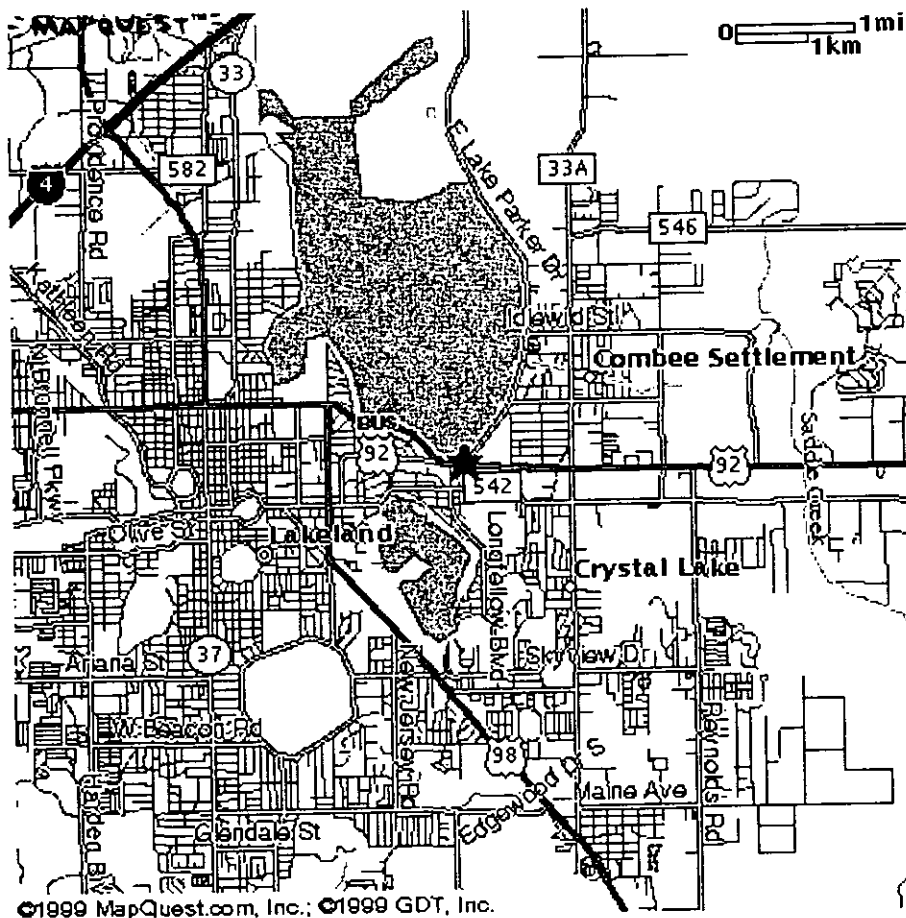
Charles Larsen Memorial Power Plant

2002 East Highway 92

Lakeland, Florida 33801

UTM Coordinates: Zone 17, 408.9 km East and 3102.5 km North

The Charles Larson Plant is located at the Southern tip of Lake Larsen as shown in the following map (from Yahoo website).



3. Source Description

The Charles Larsen Memorial Power Plant facility consists of two fossil fuel-fired steam generators, one combined cycle combustion turbine (Unit No. 8) and three simple cycle gas turbine peaking units. Natural gas and fuel oil are the primary fuels.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Unit No. 8 consists of a General Electric PG 7111EA (7EA) combustion turbine-electrical generator with an unfired heat recovery steam generator (HRSG). This unit is capable of generating approximately 90 MW while operating in simple cycle and 120 MW when in combined cycle (59 degrees F).

When operated in combined cycle the HRSG provides steam that repowers the existing steam turbine-electrical generator that was previously powered by steam from a conventional fossil fuel steam generator (Unit No. 5).

The primary fuels are natural gas and No. 2 fuel oil with a maximum sulfur content of 0.2 percent by weight. Nitrogen oxide emissions are controlled by water injection for both gas and oil operation. The CT is equipped with a direct water spray turbine inlet fogging system. When operated in combined cycle mode, the combustion gases are exhausted through the stack following the HRSG. When operated in simple cycle mode, the combustion gases are exhausted via a by-pass stack prior to the HRSG. Unit No. 8 began commercial service in July, 1992.

4. Current Permit and Major Regulatory Program Status

Construction of the 120 MW combined cycle combustion turbine was authorized by the Department under permits AC53-190437 and Permit PSD-FL-166 issued on July 26, 1991. Subsequent revisions to the construction permit are:

- PSD-FL-166A/1050003-001-AC dated December 22, 1995
- PSD-FL-166B/1050003-005-AC dated April 17, 1998
- PSD-FL-166C/1050003-007-AC dated May 30, 2000

The facility operates under Title V Air Operation Permit No. 1050003-011-AV, which became effective on January 1, 2003. Based on the Title V Air Operation Permit Renewal application received June 19, 2002, this facility is not a major source of hazardous air pollutants (HAPs).

Unit No. 8 is subject to a determination of Best Available Control Technology (BACT) under the original PSD air construction Permit No. PSD-FL-166. It is subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines adopted by the Department at 62-204.800, F.A.C. This combined cycle Unit No.8 and the fossil fuel steam generator No. 7 are regulated under the Title IV of the Clean Air Act, Acid Rain, Phase II.

5. Permit Request

On April 1, 2003 (complete on August 27) the Department received a request from the City of Lakeland to:

- Modify heat input limits to allow peak mode operation.
- Increase the annual emission limit for SO₂ to reflect an average of 1 grain sulfur/100scf.
- Allow installation of high-pressure seals of the compressor discharge.

6. Description of Peak Mode Operation and Technical Upgrade

Peak mode operation is a computer-controlled increase in firing temperature with greater heat input and output. It is a standard operating feature of the GE 7EA, but such units are operated in this mode for only a few hundred hours per year (if at all).

The original PSD and Title V Operation permits did not reflect the Unit's original design and ability to run in Peak Mode although the initial compliance tests demonstrated the capability of the unit to meet the NO_x emission limitations (concentration basis) while operating at peak mode. However, peak mode operation was included in the original design of Unit No.8 and allows the unit to run at higher power and heat input.

The technical upgrade consists of a General Electric enhancement to the design of the high-pressure seals of the compressor discharge. Basically, a high-pressure brush seal is added to the existing labyrinth seal

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

design to direct less air for cooling purposes and more to the combustor. This allows an increase in the amount of air available to perform work in the cycle. This in turn theoretically leads to improved gas turbine performance in terms of output and heat rate (the amount of heat input necessary to produce a unit of electrical output).

7. Emission Increases Due to Peaking and Technical Upgrades

Following are the estimated emission increases due to peaking and the technical improvements. The NO_x increases are proportional to the increases in heat input requested for peaking and the technical upgrade. This is reasonable because emissions are presently controlled by water injection to their respective concentration limits (or mass per unit of heat input) while firing gas or fuel oil. Normally only sufficient water is injected to meet the required concentration-based limits.

Peaking and the technical upgrade allow greater heat input and therefore provide for a higher firing temperature. This usually results in better burnout of CO, VOC, and particulate matter and lower emissions in terms of concentration or mass per unit of heat input. Nevertheless, the estimates given below were calculated in direct proportion to the heat input increases and considering the possibility that increased water injection for NO_x control will tend to increase CO and VOC.

Sulfur dioxide emissions are obviously directly related to heat input. Additional SO₂ emission increases are requested to reflect the actual sulfur concentration of the inherently clean natural gas provided through the interstate pipeline system (over which customers have no control).

PROPOSED ANNUAL INCREASE TONS PER YEAR

Pollutant	Peak Mode Increase @ 3000 hrs/yr	Upgrade Increase @ Peak Mode	Upgrade Increase @ Base Load	Total Increase Peak & Upgrade	PSD Threshold
NO _x	13.92	3.29	6.40	23.61	40
PM/PM ₁₀	1.15	0.27	0.64	2.06	25/15
CO	6.92	1.63	2.90	11.46	100
VOC	0.37	0.09	0.21	0.67	40
SO ₂	4.53	1.08	3.60	9.21	40

Source: Application and additional information submitted on April 1 and July 2, 2003 respectively. Emissions are estimated based on 2500 hrs/yr of gas firing and 500 hrs per year of oil firing.

8. Rule Applicability

The proposed facility is subject to all applicable requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-214, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) including applicable portions of the Code of Federal Regulations 40 CFR Part 60, Part 72, Part 73, Part 75 and Part 77 incorporated therein.

This facility is located in Polk County; an area designated as attainment for all criteria pollutants in accordance with Rule 62-204.360, F.A.C.

9. Evaluation of PSD Applicability

As a major source, a physical or operational change to Unit No. 8 that results a **significant net emissions increase** is subject to PSD review. Significant net emissions increase is defined in Rule 62-212.400, F.A.C. as follows:

Significant Net Emissions Increase – A significant net emissions increase of a pollutant regulated under the Act is a net emissions increase equal to or greater than the applicable significant emission rate listed in Table 212.400-2, Regulated Air Pollutants – Significant Emission Rates.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The significant emission rates are included (see PSD Threshold) in the Table above. The meaning of a net emissions increase is given in Rule 62-212.400, F.A.C. as:

***Net Emissions Increase** - A modification to a facility results in a net emissions increase when, for a pollutant regulated under the Act, the sum of all of the contemporaneous creditable increases and decreases in the **actual emissions** of the facility, including the increase in emissions of the modification itself and any increases and decreases in quantifiable fugitive emissions, is greater than zero.*

The definition of actual emissions is given in Rule 62-210.200, F.A.C. (definitions) as follows:

***Actual Emissions** - The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:*

- (a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.*
- (b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that, for any regulated air pollutant, such unit-specific allowable emissions limits are federally enforceable.*
- (c) For any emissions unit (other than an electric utility steam-generating unit specified in subparagraph (d) of this definition) which has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.*
- (d) For an electric utility steam generating unit (other than a new unit or the replacement of an existing unit) actual emissions of the unit following a physical or operational change shall equal the representative actual annual emissions of the unit following the physical or operational change, provided the owner or operator submits to the Department on an annual basis, for a period of 5 years representative of normal post-change operations of the unit, within the period not longer than 10 years following the change, information demonstrating that the physical or operational change did not result in an emissions increase. The definition of "representative actual annual emissions" found in 40 CFR 52.21(b)(33) is adopted and incorporated by reference in Rule 62-204.800, F.A.C.*

The term electric utility steam-generating unit is defined as:

***Electric Utility Steam Generating Unit** - Any steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW electrical output to any utility power distribution system for sale. Any steam supplied to a steam-electric generator that would produce electrical energy for sale is also considered in determining the electrical energy output capacity of the unit.*

Based on Department records, actual hours of operation during the most recent five year period (1998-2002) are as follows:

Year	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>
Hours	3232	5907	4114	4577	3222

The use of Unit 8 is actually affected most by the availability of other key Lakeland Electric units. Specifically these are the large base loaded 365 MW coal fired McIntosh Unit 3 and the very efficient 350

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

MW gas-fired combined cycle McIntosh Unit 5. For reference, the McIntosh plant is located on the north side of Lake Larson whereas the Larson Plant is located on the south side.

The construction of McIntosh Unit 5 as a simple cycle unit followed by its conversion to combined cycle operation is clearly the reason for the reduction in use of Larson Unit 8 since 1999. The ability to operate in peak mode and the technical upgrade will not appreciably change the reliance upon Larson Unit No.8 in terms of hours of operation. These modifications will certainly not cause the unit to operate even as many hours as it operated in 1999-2000 (the likely baseline for this unit).

The maximum possible emission increases were based on implementation of peaking and the upgrade given 8,760 hours of operation. Therefore the emission increases are conservative given that the modifications will not cause substantial increases in the hours of operation.

Larson Unit No.8 clearly meets the definition of an electric utility steam generator. Based on the foregoing analysis, the Department does not expect an increase in hours of operation or a significant increase in actual emissions and therefore concludes that the modifications are not subject to PSD review and a new BACT determination is not required.

9. Conclusion

The Department concludes that PSD is not applicable to this project since this project as presented will not result in significant net emissions increase to a major facility. The changes will not cause a significant impact or cause or contribute to a violation of any ambient air quality standard or PSD increment.

The Department will issue a construction permit that supplements previous construction permits to reflect peak mode operation and the additional requested changes.

The Department's conclusion does not set a precedent for projects implemented at any other facility for a number of reasons. It is conceivable that seemingly similar modifications at units at other facilities could stimulate additional production beyond typical demand growth and cause emissions increases beyond the levels calculated given constant hours of operations.

For further details regarding this review, contact:

*A.A. Linero, P.E., Program Administrator
Teresa Heron, Review Engineer
New Source Review Section
Bureau of Air Regulation*

DRAFT PERMIT

PERMITTEE:

City of Lakeland, Electric Utilities
501 E. Lemon Street
Lakeland, Florida 33801-5079

Authorized Representative:

Timothy Bates, Director Energy Supply

DEP File No. 1050003-012-AC
PSD Permit No. PSD-FL-166(D)
Unit 8 Peak Mode/Turbine Upgrade Project
SIC No. 4911
Expires: April 30, 2004

PROJECT AND LOCATION:

This permit authorizes peak mode operation and the installation of the high-pressure brush seals to minimize air leakage from the compressor to the combustor for the existing combined cycle combustion turbine. The unit is a 120 MW combined cycle General Electric PG7111EA combustion turbine-electrical generator designated as Larsen Unit No. 8. Unit 8 fires natural gas as the primary fuel and distillate oil as a limited alternate fuel. Peak mode operation is authorized for up to 3000 hours per year, of which no more than 500 hours per year may occur when firing distillate oil.

Unit 8 is installed at the City of Lakeland's existing Charles Larsen Memorial Power Plant, which is located in Lakeland at 2002 East Highway 92 East in Polk County, Florida.

The UTM coordinates are: Zone 17; 408.9 km E and 3102.5 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

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Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Units Specific Conditions

Section 4. Appendices

Michael G. Cooke, Director
Division of Air Resources Management

FACILITY AND PROJECT DESCRIPTION

This facility consists of two fossil fuel-fired steam generators, one combined (or simple) cycle combustion turbine and two simple cycle gas turbine peaking units. Natural gas and oil are the primary fuels. The existing facility includes the following regulated emissions units.

Emission Unit No.	Brief Description
-003	Fossil Fuel Fired Steam Generator #6
-004	Fossil Fuel Fired Steam Generator #7
-005	Peaking Gas Turbine #3
-006	Peaking Gas Turbine #2
-008	Combined (or Simple Cycle) Combustion Turbine 8

This permit authorizes installation of high-pressure brush seals, operation in peaking mode, and modifies emissions limits accordingly on existing Emission Unit No. 008, Combined (or Simple Cycle) Combustion Turbine 8.

REGULATORY CLASSIFICATION

Title III: Based on the Title V Air Operation Permit Renewal application received June 19, 2002 and the Construction Application received on April 1, 2003, this facility is not a major source of hazardous air pollutants (HAPs).

Title IV: The existing facility has two units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: All documents related to applications for permits regarding construction and operation shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be sent to the Air Resources Section of Department's Southwest District Office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of Air Resources Section of Department's Southwest District Office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218.
3. Citation Format: Appendix A identifies the formats used in the permit for citing applicable requirements.
4. General Conditions: Appendix B specifies the general conditions applicable to all permits.
5. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Permit: This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.] [Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU-008 – Combined Cycle Unit 8

This section of the permit addresses the following existing emissions unit.

Emissions Unit No. 008

The emission unit is a 120 megawatt combined (or simple cycle) combustion turbine with a heat recovery steam generator (HRSG) designated as Larsen Unit No. 8. The combustion turbine fires natural gas as the primary fuel and No. 2 distillate oil with a maximum sulfur content of 0.20 percent by weight as a limited auxiliary fuel. The combustion turbine is a GE Model PG7111 Frame 7EA unit equipped with water injection to reduce nitrogen oxides emissions, an inlet fogger system, and will be authorized by this action to operate in peaking mode. The HRSG powers an existing steam turbine. The emissions unit can exhaust through the HRSG or through a by-pass stack. Unit 8 began commercial service in July, 1992.

{Permitting Note: This emission unit is subject to the requirements of previous PSD Permit No. PSD-FL-166 (as amended) and current Title V air operation Permit No. 0310157-011-AV.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. [Rule 62-4.070, F.A.C.]

AUTHORIZED WORK

2. Installation/Upgrade: The permittee is authorized to conduct an upgrade consisting of installation of a high-pressure packing seal that regulates the flow of compressor air between various internal components.

{Permitting Note: The new systems will minimize the amount of air required for cooling and increase the amount available for work in the cycle. This will increase the heat input and power output capacity of the unit.}

[Applicant Request; Design; Rule 62-210.200(PTE), F.A.C.]

AUTHORIZED OPERATION

3. Base Load Heat Input: Following installation of the high-pressure seals, the maximum base load process/operation rate, at an inlet temperature of 25 degrees F, shall not exceed 1075 MMBtu per hour (lower heating value) heat input firing natural gas or 1060 MMBtu per hour (lower heating value) heat input firing No. 2 distillate oil. [Applicant Request; Design]

{Permitting Note: For reference, the unit was previously limited by Permit No. PSD-FL-166 (as amended) and Specific Condition D.1 in Section III of Title V Operation Permit 1050003-011-AV.}

4. Peaking Mode Heat Input: Following installation of the high-pressure seals, the gas turbine may operate in a high-temperature peaking mode to generate additional electrical power. During any consecutive 12 months, Unit 8 shall operate in peaking mode no more than 3000 hours, of which a maximum of 500 hours can be while firing fuel oil.

During peak mode operation, the maximum base load process/operation rate, at an inlet temperature of 25 degrees F, shall not exceed 1161 MMBtu per hour (lower heating value) heat input firing natural gas or 1149 MMBtu per hour (lower heating value) heat input firing No. 2 distillate oil.

[Applicant Request; Design; Rule 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU-008 – Combined Cycle Unit 8

EMISSION LIMITATIONS

5. Emission Limitations and Standards: Unit No. 8 is subject to the following emissions limits under base load and peaking modes. Emissions limits are corrected to 15% oxygen.

Operating Mode	NO _x	SO ₂	CO	VOC	PM	VE
Peaking (Gas)	25 ppmvd 115 lb/hr	1 gr S/100 scf 3.5 lb/hr	25 ppmvd 63 lb/hr	1.4 ppmvd 2.1 lb/hr	0.006 lb/MM Btu 7 lb/hr	10% Opacity
Base Load (Gas)	25 ppmvd 107 lb/hr	0.0019 lb/MMBtu 2.1 lb/hr	25 ppmvd 59 lb/hr	0.0018 lb/MMBtu 1.9 lb/hr	0.006 lb/MM Btu 6.5 lb/hr	10% Opacity
Total, Gas	425 TPY	12.9 TPY	232 TPY	9 TPY	22 TPY	---
Peaking (Fuel Oil)	42 ppmvd 192 lb/hr	0.20% Sulfur 234 lb/hr	25 ppmvd 64 lb/hr	3.5 ppmvd 5.1 lb/hr	0.025 lb/MM Btu 29 lb/hr	10% Opacity
Base Load (Fuel Oil)	42 ppmvd 180 lb/hr	0.20 % Sulfur 215 lb/hr	25 ppmvd 60 lb/hr	0.0045 lb/MMBtu 4.8 lb/hr	0.025 lb/MM Btu 27 lb/hr	10% Opacity
Total, Oil	244 TPY	316 TPY	79 TPY	6.7 TPY	22 TPY	---

{Permitting Note: The revisions of mass emission rates (lb/hour) account for additional heat input. The revision to the SO₂ mass emission rates also account for a maximum permitted sulfur content of natural gas not to exceed 1 grain per 100 standard cubic feet of gas. In accordance with air construction Permit 1050003-007-AC (PSD-FL-166C), no limitations or test requirements are set for beryllium, mercury, or lead.}

COMPLIANCE DETERMINATION

6. Testing Requirement: Within 180 days after installation of the high-pressure brush seals, the permittee shall demonstrate initial compliance with the emissions limitations and standards specified for peaking mode operation and revised base load operation by conducting tests using the EPA reference methods provided in 40 CFR 60, Appendix A, and adopted by reference in Chapter 62-204.800, F.A.C. Tests shall be conducted on both natural gas and distillate oil. Thereafter, the testing requirements for each pollutant shall be determined in the same manner and frequency as specified in Title V air operation Permit No. 1050003-011-AV.

[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

TEST METHODS AND PROCEDURES:

The following reference methods shall be used to demonstrate compliance. No other test methods may be used for compliance testing unless prior Department approval is received in writing.

7. Nitrogen Oxides (NO_x): NO_x emissions shall be determined by conducting EPA Reference Method 7, "Determination of Nitrogen Oxides Emissions from Stationary Sources."
8. Particulate Matter/Opacity: The stack opacity shall be determined by conducting EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources." This test shall serve as a surrogate for particulate matter compliance testing. If 10% opacity is exceeded, the Department may require the permittee to determine particulate matter emissions by conducting EPA Reference Methods 5, 5B or 17, "Determination of Particulate Matter Emissions from Stationary Sources."

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU-008 – Combined Cycle Unit 8

9. Carbon Monoxide (CO): CO emissions shall be determined by conducting EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources."
10. Volatile Organic Compounds (VOC): VOC emissions shall be determined by conducting EPA Reference Method 25A, "Determination of Volatile Organic Emissions from Stationary Sources." The permittee may also elect to conduct EPA Reference Method 18 on a concurrent sample to determine emissions of methane and ethane, which may be excluded from the determination of VOC emissions as determined by EPA Method 25A. Otherwise, all organic compounds measured by EPA Method 25A are assumed to be regulated VOC emissions.
11. Sulfur Dioxide: Compliance with the distillate oil sulfur standard ($\leq 0.20\%$ sulfur by weight) shall be determined by ASTM D 2880-96 or the most recently approved version (incorporated by reference; see 40 CFR 60.17).

{Permitting Note: No. 2 distillate oil is only supplied with intermediate bulk storage. A custom fuel monitoring schedule has been established for natural gas. Refer to Specific Conditions D.22, D.24 and D.30 in Section III of Title V air operation Permit No. 1050003-011-AV.}

[Permit No. PSD-FL-166 and Title V air operation Permit No. 1050003-011-AV]

RECORDS AND REPORTS

12. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. At a minimum, the test report shall provide the information specified in Rule 62-297.310(8), F.A.C. [Rule 62-297.310(8), F.A.C.]
13. Hours of Operation: The applicant shall record the hours of operation for each fuel type and for operation in peaking mode. [Rule 62-4.070(3), F.A.C.]
14. Future Emissions: The owner or operator shall submit to the Department on an annual basis, for a period of 5 years representative of normal post-change operations of the unit, within the period not longer than 10 years following the change, information demonstrating that the physical or operational change did not result in an emissions increase. The definition of "representative actual annual emissions" found in 40 CFR 52.21(b)(33), adopted and incorporated by reference in Rule 62-204.800, F.A.C.

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Appendix A. Citation Formats
Appendix B. General Conditions

SECTION 4. APPENDIX A

CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001" identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable, covered in previous permits);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable, covered in previous permits); and
 - c. Compliance with New Source Performance Standards (Not Applicable, covered in previous permits).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Timothy Bates
Director, Energy Supply
City of Lakeland, Electric Utilities
501 East Lemon Street
Lakeland, FL 33801-5079

2. Article Number (Copy from service label)

7000 2870 0000 7028 3260

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

D. Is delivery address different from item 1? ☐ Agent ☐ AddresseeIf YES, enter delivery address below: ☐ Yes ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes**U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)**

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Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
Timothy Bates
Street, Apt. No., or PO Box No.
501 E. Lemon St.
City, State, ZIP+4
Lakeland, FL 33801-5079

PS Form 3800, May 2000

See Reverse for Instructions