

**HOPPING GREEN SAMS & SMITH**

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December 4, 1995

KRISTIN M. CONROY  
CONNIE C. DURRENCE  
JONATHAN S. FOX  
JAMES C. GOODLETT  
GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
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LISA K. RUSHTON  
R. SCOTT RUTH  
JULIE R. STEINMEYER  
T. KENT WETHERELL, II

OF COUNSEL  
CARLOS ALVAREZ  
W. ROBERT FOKES

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BUREAU OF  
AIR REGULATION

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CHERYL G. STUART

**BY HAND DELIVERY**

Kenneth Plante, Esquire  
Office of the General Counsel  
Department of Environmental Protection  
3900 Commonwealth Boulevard  
Tallahassee FL 32399-2400

RE: City of Lakeland; Larsen Power Plant, Unit No. 8  
Notice of Permit Amendment  
Permit No. AO53-219296  
Polk County, Florida  
OGC Case No. 95-2411

Dear Mr. Plante:

On September 25, 1995, the City of Lakeland, Department of Electric & Water Utilities ("Lakeland") received the above-referenced Notice of Permit Amendment for its Larsen Power Plant, Unit No. 8, located in Polk County, Florida. The Notice of Permit Amendment was signed by William C. Thomas, P.E., Air Program Administrator, Southwest District Office, Department of Environmental Protection. Pursuant to Rule 62-103.155(3)(a), Florida Administrative Code, (F.A.C.), and Order of the Department dated October 17, 1995, Lakeland has until December 9, 1995, to file a petition for administrative proceedings regarding the Notice of Permit Amendment.

On behalf of Lakeland, I hereby request, pursuant to Rule 62-103.070, F.A.C., an extension to and including February 9, 1996, in which to file a petition for administrative proceedings regarding the Notice of Permit Amendment. As good cause for granting the request for extension of time for filing, Lakeland states the following:

Kenneth Plante, Esquire  
December 4, 1995  
Page 2

1. The Permit Amendment contains provisions which appear to warrant clarification or correction.
2. Lakeland representatives have correspondence with the Southwest District air staff regarding these provisions, and at least one of the issues should be resolved when the proposed construction permit amendment is finalized by the Department's Tallahassee office.
3. This request is filed simply as a protective measure to avoid waiver of Lakeland's right to challenge the Permit Amendment. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings.
4. I hereby certify that I have attempted without success to contact W. Douglas Beason of the Department's Office of General Counsel regarding this request to determine whether he has an objection to the extension of time.

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings in regards to the Notice of Permit Amendment for Permit No. AO53-219296 to and including February 9, 1996.

Sincerely,



Angela R. Morrison

cc: W. Douglas Beason, Esquire, DEP  
Clair Fancy, BAR, DEP  
Martin Costello, BAR, DEP  
William D. Thomas, DEP SW District  
William E. Schroeder, DEP SW District  
Farzie Shelton, City of Lakeland



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 14, 1995

Mr. C.H. Fancy, P.E.  
Chief Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**

**NOV 28 1995**

**BUREAU OF  
AIR REGULATION**

Dear Mr. Fancy:

**Re: Amendment of PSD-FL-166/AC53-190437  
City of Lakeland, Larson Power Plant Unit 8**

We are in receipt of your communication dated September 21, and October 31, 1995 and attached Proposed Permit Amendment, Intent to Issue, Public Notice of Intent to Issue Permit Amendment for the above referenced facility.

Pursuant to Section 403.815, Florida Statutes and DEP Rule 62-103.150, F.A.C., on November 10, 1995 we published the "Notice of Intent to Issue Permit Amendment". 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 at (941) 499-6603.

Sincerely

Farzie Shelton  
Environmental Division

Enclosure

# AFFIDAVIT OF PUBLICATION

## THE LEDGER Lakeland, Polk County, Florida

No .....

OF FLORIDA)  
NTY 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

matter of .....

To Issue Permit

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

November 10;

1995

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 or publication in the said newspaper.

Signed

Nelson Kirkland  
Classified Advertising Manager

by Nelson Kirkland who is  
personally known to me

born to and subscribed before me this ..... 10th .....

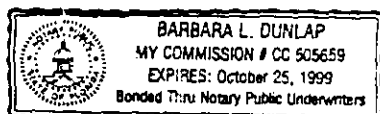
of ..... November ..... A.D. 19..... 95

Seal

Barbara L. Dunlap  
Notary Public

Commission Expires ..... 10-25-99

City of  
Lakeland



F 507

### STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT PSD-FL-166/AC53-190437

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to the City of Lakeland, Department of Electric and Water Utilities, 501 East Lemon Street, Lakeland, Florida 33801-5050. The amendment is of certain specific conditions related to the monitoring sulfur dioxide (SO<sub>2</sub>) and sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) emissions, and nitrogen oxides (NO<sub>x</sub>) reporting applicable to the Charles Larson Power Plant Unit No. 8.

The U.S. Environmental Protection Agency reviewed and concurred with the customized fuel monitoring schedule. The changes in SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> limits are actually corrections and are not significant. The Department will remove the requirement in the PSD/air construction permit to correct compliance test data to ISO conditions for comparison with the NO<sub>x</sub> emission limit of 25 ppm (dry, normal gas) provided there will not be an increase in either lb/hr or tons/yr of NO<sub>x</sub> emissions. The applicant is required to submit an analysis of continuous emission monitoring data which shows that this action will not cause reductions in the water injection with corresponding increases in NO<sub>x</sub> emissions. Therefore, this change will not cause or contribute to a violation of any of pollution ambient air standard or adversely affect the environment.

A person whose substantial interests are affected by the Department's proposed permitting action may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; the applicant's name and address; the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application 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  
1115 Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Southwest District  
8407 Laurel Fair Circle  
Tampa, Florida 33619

Polk County Natural Resources Division  
4199 Ben Durand Road  
Bartow, Florida 33830

Any person may send written comments on the proposed action to Administrator, New Source Review, at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

PSD-FL-11-10-1995

*Noted 11/14  
w/ Invoice  
Rev. Staff*



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

November 16, 1995

CERTIFIED MAIL

Mr. Charles D. Garing, Manager  
Charles Larsen Power Plant  
City of Lakeland  
Department of Electric & Water  
Utilities  
501 East Lemon Street  
Lakeland, FL 33801-5050

Dear Mr. Garing:

Re: Polk County - Air Permit  
DEP File No. 1050003-008-002AO  
Revisions to Larsen Unit 8  
PSD-FL-166; AC53-190437; AO53-219296

On October 23, 1995, the Department received your request for amendments to the above permits covering Larsen Unit No. 8, located in Lakeland, Polk County. In order to continue processing the application, the Department will need the following additional information pursuant to Rule 62-4.070(1), F.A.C.:

1. All compliance test reports in our files indicate that testing of Larsen Unit 8 was conducted in the summer months only. Please provide reasonable assurance that the combustion turbine will meet NOx emissions standards under less favorable conditions (i.e. winter months) when emissions are adjusted only to 15% excess oxygen.
2. Please note that the Southwest District will also consider the application for amendments to Permits AC53-190437 and AO53-219296 incomplete until approval of amendments to Permit PSD-FL-166.

Rule 62-4.050 F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response to items above should be certified by a professional engineer just as the original application was.

"NOTICE: Pursuant to the provisions of Section 120.60, F.S. and Chapter 62-12.070(5), F.A.C., if the Department does not

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. MIS 5505

1. Martin Costello

4. DEP

2. ARM - Tallahassee

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

COMMENTS:

\_\_\_\_ SECRETARY'S SIGNATURE

\_\_\_\_ DIV/DIST DIR SIGNATURE

\_\_\_\_ MY SIGNATURE

\_\_\_\_ YOUR SIGNATURE

\_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

\_\_\_\_ DISCUSS WITH ME

\_\_\_\_ COMMENTS/ADVISE

\_\_\_\_ REVIEW AND RETURN

\_\_\_\_ SET UP MEETING

\_\_\_\_ FOR YOUR INFORMATION

\_\_\_\_ HANDLE APPROPRIATELY

\_\_\_\_ INITIAL AND FORWARD

\_\_\_\_ SHARE WITH STAFF

\_\_\_\_ FOR YOUR FILES

**RECEIVED**

NOV 20 1995

BUREAU OF  
AIR REGULATION

FROM:

W. Schroeder

DATE:

NOV 17 1995

PHONE:

SC

542-6100

receive a response to this request for information within 90 days of the date of this letter. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

If you should have any questions, please call me at (813)744-6100 X104.

Sincerely,



William E. Schroeder  
Air Permitting Engineer

WES/ws

cc: Martin Costello, DARM  
Ms. Farzie Shelton, City of Lakeland



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 31, 1995

Ms. Farzie Shelton  
Environmental Coordinator  
Department of Electric and  
Water Utilities  
501 East Lemon Street  
Lakeland, FL 32801-5050

Dear Ms. Shelton:

The Department has reviewed your letter dated October 13, 1995 which included a request to change the public notice for the permit amendment on Larson Unit 8. Your letter requested to omit the language allowing a 30 day period in which to request a public hearing. The Department hereby grants your request. Please omit the last sentence on the public notice prior to publication.

If you have any questions or comments please contact Al Linero, Administrator for the New Source Review Section, or myself at (904) 488-1344.

Sincerely,

Martin Costello, P.E.  
Bureau of Air Regulation

cc: Angela Morrison, HGSS





*District  
letter*

October 19, 1995

**RECEIVED**

OCT 20 1995

BUREAU OF  
AIR REGULATION

William C. Thomas, P.E.  
District Air Program Administrator  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa FL 33619-8318

RE: Charles Larsen Power Plant Unit No. 8--Combined Cycle Gas Turbine System  
Permits Nos. PSD-FL-166; AC53-190437; AO53-219296; Sulfur Dioxide/Sulfuric  
Acid Mist Limits and Nitrogen Oxides Compliance Testing

Dear Mr. Thomas:

The City of Lakeland submitted to the Department a request for revision of the above-referenced permits and for approval of a customized fuel monitoring schedule on June 27, 1995. Subsequently, the Southwest District Office issued a Notice of [Operation] Permit Amendment on September 22, 1995, which was received by the City on September 25, 1995. In addition, the Department's Tallahassee office issued a Notice of Intent to Issue a Proposed [PSD/Construction] Permit Amendment on September 21, 1995, which was also received by the City on September 25, 1995.

In reviewing the Permit Amendment sent to us by your office, the City has noted two provisions which should be corrected or revised. An outline of those issues, along with a discussion and the City's justification for revision, follows. A separate letter was sent to the Department's Tallahassee office regarding its Proposed Permit Amendment, and a copy of that letter is attached for your information.

1. *Annual Sulfur Dioxide and Sulfuric Acid Mist Limits*--While the annual sulfur dioxide emission limits have been corrected, one incorrect sulfuric acid mist limit remains. The City again respectfully requests that the correct sulfuric acid mist limit for natural gas of 0.8 tons per year be included in a revised permit amendment. All of the other corrections were made, as requested, except for this apparent inadvertent omission. As stated in the City's earlier submittal, the incorrect limits for sulfuric acid mist emissions, for both oil and gas, were included in the PSD/construction permit, apparently as a typographical error. These incorrect limits were later transferred to the operation permit. The Department's Tallahassee office has corrected the limits in the PSD/construction permit, and the Permit Amendment issued by your office corrected the oil limit. The natural gas limit, however, remains incorrect. The City therefore respectfully requests that your office correct the natural gas limit for sulfuric acid mist to 0.8 tons per year.

William C. Thomas, P.E.  
October 19, 1995  
Page 2

2. *Correction of Nitrogen Oxides Emissions to ISO Conditions*--Consistent with the Proposed Permit Amendment to the PSD/construction permit for Unit 8, the operation permit should not include a requirement to correct annual nitrogen oxides compliance test data to ISO conditions for comparison with the nitrogen oxides emission limits. Specifically, Condition No. 19 should be deleted in its entirety. New Source Performance Standard (NSPS) references included in Condition No. 19 and the corresponding requirement to correct test data to ISO conditions are appropriate *only* for initial performance testing for determining compliance with the NSPS emission limits. As noted in the City's earlier submittal, the NSPS limits are higher than the permitted "Best Available Control Technology" limits in the City's current permit. It is inappropriate to require correction of nitrogen oxides test data to ISO conditions for any purpose other than to demonstrate compliance with the NSPS limits, and any references to the NSPS provisions requiring such correction would be inappropriate for the operation permit. The PSD/construction permit is being revised to delete any requirement to correct data to ISO conditions, and the City respectfully request that the District Office also delete any such requirement in the operation permit.

Thank you again for your response to the City's June 27 request for permit revision, and for your consideration of our comments above. We would like to see these issues amicably resolved and a final permit amendment issued as quickly as possible. If you or your staff have any questions regarding these issues, please call me at (941) 499-6603.

Sincerely,



Farzie Shelton  
Environmental Coordinator  
Department of Electric and Water Utilities

cc: Martin Costello, DEP Tallahassee  
David McNeal, Region IV, EPA  
Angela Morrison, HGSS



*al*

October 13, 1995

**RECEIVED**

OCT 13 1995

BUREAU OF  
AIR REGULATION

**VIA HAND DELIVERY**

Clair H. Fancy, Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
Magnolia Park Courtyard  
Tallahassee, FL 32399

**RE: Charles Larsen Power Plant Unit No. 8--Combined Cycle Gas Turbine System  
Permit Nos. PSD-FL-166; AC53-190437; AO53-219296; Customized Fuel  
Monitoring Schedule and Sulfur Dioxide/Sulfuric Acid Mist Limits**

Dear Clair:

The City of Lakeland submitted to the Department a request for revision of the above-referenced permits and for approval of a customized fuel monitoring schedule on June 27, 1995. Subsequently, the Department issued a Notice of Intent to Issue a Proposed Permit Amendment on September 21, 1995, which was received by the City on September 25, 1995. In addition, the Southwest District Office issued a Notice of Permit Amendment on September 22, 1995, which was also received by the City on September 25, 1995.

In reviewing the Proposed Permit Amendment sent to us by your office, the City has noted a few issues which it would like to see resolved in the final Permit Amendment. An outline of those issues, along with a discussion and the City's justification for revision, follows. A separate letter will be addressed to the Southwest District regarding the Notice of Permit Amendment it issued on September 22.

*Notice of Intent to Issue*--The Department's notice, which must be published in a newspaper within 30 days, includes language allowing any person to request a public hearing within 30 days of the notice. While the City understands that the 30-day period for public comments is required for emission units subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review, this comment period is *not required* for revisions of such permits. The permit amendments being made are relatively minor and did not trigger PSD review. The 30-day public comment period and opportunity for hearing should therefore not apply. The City therefore respectfully requests that the language in the last paragraph of the second page of the notice be deleted and not included in the publication.

Clair H. Fancy, Chief  
Bureau of Air Regulation  
October 13, 1995  
Page 2

*Annual Sulfur Dioxide and Sulfuric Acid Mist Limits*--The "Table 1" attached to the Proposed Permit Amendment is inconsistent with the table attached to the original PSD permit. For example, the mercury, lead, and beryllium standards are located in the wrong column, the sulfuric acid mist limits are incorrect, and the footnote includes the incorrect capacity factor limitation. A copy of the correct "Table 1" is attached to this letter for use by the Department. In addition, a *revised* version of Table 1 is also attached that shows the changes being made as a result of the permit amendment.

*Correction of Nitrogen Oxides Emissions to ISO Conditions*--The Proposed Permit Amendment removes the requirement to correct test data to ISO conditions for comparison with the nitrogen oxides emission limit of 25 ppm *provided* there is no increase in either pound-per-hour or ton-per-year nitrogen oxide emission rates. The Proposed Amendment also requires the City to submit an analysis of emission changes, including continuous emissions monitoring data and associated water injection rates, for at least one month prior to and after the change.

First, the requirement to correct test data to ISO conditions should be deleted not only for comparison to the 25 ppm nitrogen oxides limit for natural gas firing but also the 42 ppm limit for oil firing. Second, as set forth in our June 27 letter to the Department, the City requested only that Specific Condition No. 13 be changed to clarify that a correction of nitrogen oxide test data to ISO ambient conditions would be required only when determining initial compliance with the New Source Performance Standard limits under Subpart GG (performance test). The annual compliance test data should *not* be adjusted to ISO conditions to determine compliance with the much lower "Best Available Control Technology" (BACT) limits of 25 ppm for gas and 42 ppm for oil. The emission limits of 25 ppm and 42 ppm were not changed, and the City was not proposing to make any physical or operational changes to Unit No. 8 as a result of not adjusting test data to ISO conditions. Neither the water injection rates nor the nitrogen oxide emissions from Unit No. 8 will change as a result of annual compliance test data not being adjusted to ISO conditions. Any fluctuations in nitrogen oxide emissions would be due to combustion conditions--*not* because test data will no longer be adjusted to ISO conditions. The City therefore respectfully requests that the final permit amendment simply clarify that test data will not need to be adjusted to ISO conditions for determining compliance with the 25 and 42 ppm nitrogen oxide emission limits. The requirement to submit an analysis of emission changes should not be required and the proposed condition containing such a requirement should be deleted.

Thank you again for your response to the City's June 27 request for permit revision, and for your consideration of our comments above. We would like to see these issues amicably

Clair H. Fancy, Chief  
Bureau of Air Regulation  
October 13, 1995  
Page 3

resolved and a final permit amendment issued as quickly as possible. If you or your staff have any questions regarding these issues, please call me at (941) 499-6603.

Sincerely,

A handwritten signature in cursive script, reading "Farzie Shelton /arm".

Farzie Shelton  
Environmental Coordinator  
Department of Electric and Water Utilities

cc: Bill Thomas, FDEP Southwest District  
David McNeal, Region IV, EPA  
Angela Morrison, HGSS

TABLE 1  
ALLOWABLE EMISSION LIMITS  
Combined Cycle Combustion Turbine

Pollutant	Standards		Gas Turbine and HRSG <sup>(a)</sup>		Basis
	Gas Firing	No. 2 Fuel Oil Firing	Tons Per Year		
			Gas	Oil	
NO <sub>x</sub>	25 ppm at 15% oxygen on a dry basis	42 ppmv at 15 percent oxygen on a dry basis	425	244	BACT
SO <sub>2</sub>	Natural gas as fuel	0.2 percent S by weight	2.6	307	BACT
PM/PM <sub>10</sub>	0.006 lb/MMBtu	0.025 lb/MMBtu	22	22	BACT
VOC	-	-	9	6.7	BACT
CO	-	-	232	79	BACT
Mercury (Hg)	-	3.0 x 10 <sup>-6</sup> lbs/MMBtu	-	.003	Est. by Appl.
Lead (Pb)	-	2.8 x 10 <sup>-5</sup> lbs/MMBtu	-	0.03	" "
Beryllium (be)	-	2.5 x 10 <sup>-6</sup> lbs/MMBtu	-	.003	BACT
Sulfuric Acid Mist	Natural gas as fuel	Low sulfur content oil	-	3.2 x 10 <sup>-3</sup>	BACT

(a) Emissions rates based on 100 percent capacity factor for natural gas and 1/3 capacity factor for oil firing.

**TABLE 1**  
**ALLOWABLE EMISSION LIMITS**  
**Combined Cycle Combustion Turbine**  
**(Revised October 13, 1995)**

Pollutant	Standards		Gas Turbine and HRSG <sup>(a)</sup>		Basis
	Gas Firing	No. 2 Fuel Oil Firing	Tons Per Year		
			Gas	Oil	
NO <sub>x</sub>	25 ppm at 15% oxygen on a dry basis	42 ppmb at 15 percent oxygen on a dry basis	425	244	BACT
SO <sub>2</sub>	Natural gas as fuel	0.2 percent S by weight	<del>2.6</del> <u>8.6</u>	307	BACT
PM/PM <sub>10</sub>	0.06 lb/mmBtu	0.025 lb/MMBtu	22	22	BACT
VOC	-	-	9	6.7	BACT
CO	-	-	232	79	BACT
Mercury (Hg)	-	3.0 x 10 <sup>-6</sup> lbs/MMBtu	-	.003	Est. by Appl.
Lead (Pb)	-	2.8 x 10 <sup>-5</sup> lbs/MMBtu	-	0.03	" "
Beryllium (be)	-	2.5 x 10 <sup>-6</sup> lbs/MMBtu	-	.003	BACT
Sulfuric Acid Mist	Natural gas as fuel	Low sulfur content oil	<del>---</del> <u>0.8</u>	<del>3.2 x 10<sup>-3</sup></del> <u>9.13</u>	BACT

(a) Emissions rates based on 100 percent capacity factor for natural gas and 1/3 capacity factor for oil firing.

*all*

**HOPPING GREEN SAMS & SMITH**  
PROFESSIONAL ASSOCIATION  
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123 SOUTH CALHOUN STREET  
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October 6, 1995

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Kenneth Plante, Esquire  
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Department of Environmental Protection  
3900 Commonwealth Boulevard  
Tallahassee FL 32399-2400

RE: City of Lakeland; Larsen Power Plant, Unit No. 8  
Notice of Intent to Issue Proposed Amendment to  
Permit No. PSD-FL-166/AC53-190437  
Polk County, Florida

Dear Mr. Plante:

On September 25, 1995, the City of Lakeland, Department of Electric & Water Utilities ("Lakeland") received the above-referenced Notice of Intent to Issue a Proposed Amendment to the PSD/Construction Permit for its Larsen Power Plant, Unit No. 8, located in Polk County, Florida. The Notice of Intent to Issue was signed by C. H. Fancy, P.E., Chief of the Department's Bureau of Air Regulation. Pursuant to Rule 62-103.155(3)(a), Florida Administrative Code, (F.A.C.), Lakeland has until October 9, 1995, to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Permit Amendment.

On behalf of Lakeland, I hereby request, pursuant to Rule 62-103.070, F.A.C., an extension to and including December 9, 1995, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Permit Amendment. As good cause for granting the request for extension of time for filing, Lakeland states the following:

1. The Proposed Permit Amendment contains several specific conditions which appear to warrant clarification or correction.



Kenneth Plante, Esquire  
October 6, 1995  
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2. Lakeland representatives are in the process of discussing the pending issues with the Department's Bureau of Air Regulation staff.

3. This request is filed simply as a protective measure to avoid waiver of Lakeland's right to challenge the Proposed Permit Amendment. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings.

4. I hereby certify that I have contacted W. Douglas Beason of the Department's Office of General Counsel regarding this request, and he has no objection to this request for extension of time.

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings in regards to the Notice of Intent to Issue a Proposed Amendment to Permit No. PSD-FL-166/AC53-190437, to and including December 9, 1995.

Sincerely,

A handwritten signature in cursive script, appearing to read "Angela R. Morrison".

Angela R. Morrison

cc: W. Douglas Beason, Esquire, DEP  
Clair Fancy, BAR, DEP  
Martin Costello, BAR, DEP  
Farzie Shelton, City of Lakeland