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AIR REGULATION**

May 13, 1997

Martin Costello, P.E.  
New Source Review Section  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

**RE: Charles Larsen Memorial Power Plant  
Unit 8--Combined Cycle Gas Turbine  
Permit No. PSD-FL-166/AC53-190437  
Response to Request for Additional Information**

Dear Mr. Costello:

Lakeland Electric and Water Utilities (Lakeland) received your letter dated April 18, 1997, requesting additional information regarding our March 14 request to revise the above-referenced permit. Because Lakeland would like to resolve these pending construction permit revision issues for the Charles Larsen Memorial Power Plant (Larsen Plant) before the Title V permit becomes effective, we would like to meet with you and your staff to further discuss Lakeland's request within the next several weeks. Once the construction permit revision issues are resolved, the Title V permit can be amended accordingly. The information requested by the Department follows.

**Item C - Maximum Quantity of Fuel Oil:** The maximum annual quantity of fuel oil will vary from year to year and is not just a function of compressor inlet temperature and ambient conditions. As the backup fuel to natural gas, fuel oil is not used on a regular basis to establish relationships. Additionally, with year to year variability establishing a maximum fuel usage would be inappropriate. For clarification, Lakeland requests that the 8,190 gallons/hr in Specific Condition No. 6 be replaced with the curve provided with our March 14th request. The 23,914,800 gallons/year would remain as a specific condition.

**Item D - Use of Method 5B:** After further review, Lakeland concurs with the Department and our March 14th request to use Method 5B is rescinded.

**Item E - Carbon Monoxide Limit:** While Lakeland agrees that the Department's Best Available Control Technology (BACT) determination for carbon monoxide was based on an

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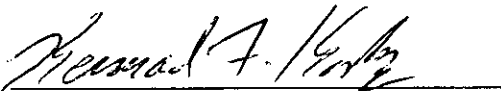
Thank you for considering this additional information. Again, we would like to schedule a meeting with you and your staff. I will contact you within the next two to three weeks to schedule a meeting to further discuss the issues addressed in this letter. If you have any questions in the meantime, please call me at 941-499-6603.

Sincerely,



Farzie Shelton  
Environmental Coordinator

Signed and Sealed by:



Kennard Kosky, P.E.  
Golder and Associates Inc.

cc: Howard Rhodes, DEP  
Clair Fancy, DEP  
Pat Comer, DEP OGC  
Scott Sheplak, DEP