




## Memorandum

# Florida Department of Environmental Protection

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TO: Joseph Kahn, Division of Air Resource Management  
THROUGH: Trina Vielhauer, Bureau of Air Regulation   
Jon Holtom, Title V Section   
FROM: Yousry Attalla, Title V Section   
DATE: February 24, 2009  
SUBJECT: Air Permit No. 1050003-015-AV  
Lakeland Electric  
Charles Larsen Memorial Power Plant  
CAIR Part Revision

The final permit for this project is attached for your approval and signature, which revises the Title V permit to include the CAIR Part form as a new section added to the existing Title V air operation permit for the above referenced facility.

The attached final determination identifies issuance of the combined draft/proposed permit, summarizes the publication process, and provides the Department's response to comments (if any) on the draft permit. There are no pending petitions for administrative hearings or extensions of time to file a petition for an administrative hearing.

I recommend your approval of the attached final permit for this project.

Attachments

## NOTICE OF FINAL PERMIT

*In the Matter of an  
Application for Permit by:*

Lakeland Electric  
501 East Lemon Street  
Lakeland, Florida 33901


Air Permit No. 1050003-015-AV  
Charles Larsen Memorial Power Plan  
CAIR Part Revision Project  
Polk County

Designated Representative:  
Timothy Bachand, P.E., Manager of Engineering

Enclosed is final permit No. 1050003-015-AV. This Title V air operation permit revision is being issued to incorporate the Clean Air Interstate Rule (CAIR) provisions into Title V permit No. 1050003-014-AV. The existing facility is located at 2002 Hwy 92 East, Lakeland, Polk County, Florida. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

  
Trina Vielhauer, Chief  
Bureau of Air Regulation

TLV/jh/yha

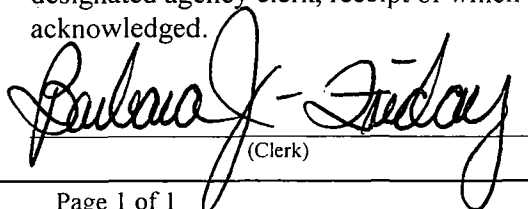
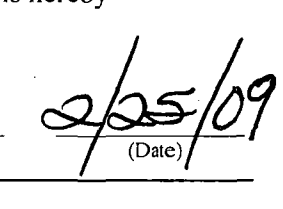
### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit and Final Determination), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below:

Mr. Timothy Bachand, Lakeland Electric: [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
Ms. Katy Forney, U.S. EPA Region 4: [forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)  
Ms. Mara Nasca, South District Office: [mara.nasca@dep.state.fl.us](mailto:mara.nasca@dep.state.fl.us)  
Ms. Ana Oquendo, EPA Region 4: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov)  
Ms. Katy Forney, U.S. EPA Region 4: [forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)  
Ms. Barbara Friday, DEP BAR: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)  
Ms. Victoria Gibson, DEP BAR: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us) (for reading file)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

   
(Clerk) (Date) 2/25/09

## FINAL DETERMINATION

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### PERMITTEE

Lakeland Electric  
501 East Lemon Street  
Lakeland, FL 33801

### PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)  
Division of Air Resource Management  
Bureau of Air Regulation, Title V Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. 1050003-015-AV  
Charles Larsen Memorial Power Plant

The purpose of this Title V air operation permit revision project is to incorporate the Clean Air Interstate Rule (CAIR) provisions into Title V permit No. 1050003-014-AV

### NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Permit package on June 6, 2008. The applicant published the Public Notice of Intent to Issue in the The Ledger on January 24, 2009. The Department received the proof of publication on February 2, 2009.

### COMMENTS

No comments on the draft/proposed permit were received from the US EPA Region 4 Office. No comments were received from the public during the 30-day public comment period.

### DEPARTMENT INITIATED CHANGES

Changes initiated by the Department were made in this final permit.

### STATEWIDE FORMAT CHANGES

1. As a result of a recent rule change to Rule 62-213.420(1)(a)2., F.A.C., the Renewal Application Due Date for Permit No. 1050003-014-AV as shown on the placard page of the permit is changed from July 5, 2012, to May 20, 2012. {The rule change requires the renewal application to be submitted 225 days prior to expiration instead of the previous 180 days.}
2. A cover page, a Table of Contents and placard page are added to the final permit package.

### CONCLUSION

The final action of the Department is to issue the final permit with the changes noted above.

## STATEMENT OF BASIS

Title V Final Revision No. **1050003-015-AV**  
Lakeland Electric  
Charles Larsen Memorial Power Plant  
Facility ID No. 1050003  
Polk County

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

On April 28, 2008, the applicant submitted a CAIR Part Form in order to incorporate the Clean Air Interstate Rule provisions into Title V Air Operation Permit No. 1050003-014-AV. The CAIR Part Form is now a part of this permit and has been incorporated as Section V, CAIR Part Form. This section identifies the units that must comply with the standard requirements and special provisions set forth in the CAIR Part Form.

This facility consists of one fossil fuel-fired steam generator (#7), two simple cycle combustion turbine (CT) peaking units (#2 and #3), one simple and combined cycle CT (#8), fuel oil storage tanks and associated equipment. Also, included in this permit are miscellaneous insignificant and unregulated emissions units and/or activities.

Fossil fuel-fired steam generator #7 is a nominal 50 megawatt (electric) steam generator designated by the plant as Unit #7. Unit #7 began commercial service in 1966. This emission unit is fired on No. 6 fuel oil at a maximum heat input of 728.0 MMBtu per hour based on the higher heating value (HHV) or natural gas at a maximum heat input of 763.0 MMBtu per hour based on the HHV. The emissions unit is regulated under Acid Rain, Phase II and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 MMBtu per Hour Heat Input. A Compliance Assurance Monitoring (CAM) plan is not required because there are no add-on control devices installed to meet the applicable emission limiting standards.

Peaking Units #2 and #3 are simple cycle CTs fired with natural gas or No. 2 distillate fuel oil with a maximum sulfur content of 0.50 percent by weight. CTs #2 and #3 began commercial service in 1962. The maximum heat input rate for each gas CT is 209 MMBtu per hour. Each unit is rated at 11.5 megawatts (electric). Emissions from the gas turbines are uncontrolled. These units are not subject to 40 Code of Federal Regulations (CFR) 60, Subpart GG, Standards of Performance for Stationary Gas Turbines. Each CT has its own stack. A CAM plan is not required because there are no specific limiting standards and there are no add-on control devices installed.

Emissions unit #8 is a 120 megawatt combined or simple cycle CT with a heat recovery steam generator (HRSG) designated by the plant as Unit #8. CT #8 began commercial service in July, 1992. The CT fires natural gas as the primary fuel and No. 2 distillate fuel oil with a maximum sulfur content of 0.20 percent by weight as a limited auxiliary fuel. The CT is a GE Model PG7111 Frame 7EA unit equipped with water injection, to reduce nitrogen oxides (NO<sub>x</sub>) emissions, and an inlet fogger system. The HRSG powers an existing steam turbine. The emissions unit can exhaust through the HRSG or through a by-pass stack. The emissions unit is authorized to operate in a base load mode and a peaking mode. This emissions unit is regulated under Acid Rain, Phase II, and the New Source Performance Standards (NSPS) - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines. It was permitted under Prevention of Significant Deterioration (PSD), Permit No. PSD-FL-166 [and amended (A thru D)], and underwent a determination of Best Available Control Technology (BACT), signed July 26, 1991. CAM applies because the NO<sub>x</sub> emissions are greater than 100 tons per year before control, post control of NO<sub>x</sub> is by water injection, and there is no continuous emissions monitoring system (CEMS) used for compliance purposes. Compliance is demonstrated annually by stack testing and by using a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine.

Based on the Title V Air Operation Permit Renewal application received June 26, 2007, this facility is not a major source of hazardous air pollutants (HAPs).

**Lakeland Electric  
Charles Larsen Memorial Power Plant  
Facility ID No. 1050003  
Polk County**

**Title V Air Operation Permit Revision**

**Final Permit No. 1050003-015-AV**  
(1<sup>st</sup> Revision of Title V Air Operation Permit No. 1050003-014-AV)

**Permitting Authority**

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: (850) 488-0114  
Fax: (850) 921-9533

**Compliance Authority**

State of Florida  
Department of Environmental Protection  
Southwest District Office  
Air Resource Section

13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926

Phone: (813) 632-7600  
Fax: (813) 632-7668

# Title V Air Operation Permit Revision

Final Permit No. 1050003-015-AV

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# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## Permittee:

Timothy Bachand, P.E., Manager of Engineering  
Lakeland Electric  
501 East Lemon Street  
Lakeland, Florida 33801-5079

**Air Permit No.** 1050003-015-AV  
**Facility ID No.** 1050003  
Charles Larsen Memorial Power Plant  
**SIC Nos.** 49, 4911  
**Project:** Title V CAIR Part Revision

The purpose of this permit is for the revision of Title V Air Operation Permit No. 1050003-014-AV to incorporate the Clean Air Interstate Rule (CAIR) Part as an enforceable section of the permit. The existing facility is located at 2002 Hwy 92 East, Lakeland, Polk County; UTM Coordinates: Zone 17, 408.9 km East and 3102.5 km North; and, Latitude: 28° 02' 56" North and Longitude: 81° 55' 25" West.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

## Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities  
Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix TV-4, Title V Conditions (Version Dated 2/12/02)  
Appendix SS-1, Stack Sampling Facilities (Version Dated 10/07/96)  
Acid Rain Phase II Part Application Renewal dated April 14, 2004  
Alternate Sampling Procedure: ASP No. 97-B-01  
Florida Department of Environmental Protection Order dated January 2, 1986

**Effective Date:** January 1, 2008  
**Revision Effective Date:** February 24, 2009  
**Renewal Application Due Date:** May 20, 2012  
**Expiration Date:** December 31, 2012

  
\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

TLV/jh/yha

**SECTION V. CAIR PART FORM**  
**CLEAN AIR INTERSTATE RULE PROVISIONS**

**Clean Air Interstate Rule (CAIR).**

**Operated by:** Lakeland Electric

**Plant:** Charles Larsen Memorial Power Plant

**ORIS Code:** 0675

The emissions units below are regulated under the Clean Air Interstate Rule.

| EU No. | EPA Unit ID# | Brief Description  |
|--------|--------------|--|
| 004    | 7            | Nominal 50 Megawatt Fossil Fuel-Fired Steam Generator    |
| 008    | 8            | 120 Megawatt Combined or Simple Cycle Combustion Turbine |

1. Clean Air Interstate Rule Application. The Clean Air Interstate Rule Part Form submitted for this facility is a part of this permit. The owners and operators of these CAIR units as identified in this form must comply with the standard requirements and special provisions set forth in the CAIR Part Form (DEP Form No. 62-210.900(1)(b)) dated March 16, 2008, which is attached at the end of this section. [Chapter 62-213, F.A.C. and Rule 62-210.200, F.A.C.]



## Clean Air Interstate Rule (CAIR) Part

This submission is: ☒ New ☐ Revised ☐ Renewal

**Identify the source by  
plant name and ORIS  
or EIA plant code**

|                                     |                |                         |
|-------------------------------------|----------------|-------------------------|
| Plant Name:                         | State: Florida | ORIS or EIA Plant Code: |
| Charles Larsen Memorial Power Plant |                | 0675                    |

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

**In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).**

For new units, enter the requested information in columns "e" and "f."

[illegible]

RECEIVED

APR 28 2008

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BUREAU OF AIR REGULATION

Final Permit No.1050003-015-AV  
CAIR Part Form

**SECTION V. CAIR PART FORM**  
**CLEAN AIR INTERSTATE RULE PROVISIONS**

Charles Larsen Memorial Power Plant

Plant Name (from STEP 1)

**STEP 3**

**Read the  
standard  
requirements.**

**CAIR NO<sub>x</sub> ANNUAL TRADING PROGRAM**

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall:
  - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
  - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO<sub>x</sub> source with the following CAIR NO<sub>x</sub> Emissions Requirements.

NO<sub>x</sub> Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO<sub>x</sub> emissions for the control period from all CAIR NO<sub>x</sub> units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
- (2) A CAIR NO<sub>x</sub> unit shall be subject to the requirements under paragraph (1) of the NO<sub>x</sub> Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR NO<sub>x</sub> allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO<sub>x</sub> Requirements, for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> allowance was allocated.
- (4) CAIR NO<sub>x</sub> allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
- (5) A CAIR NO<sub>x</sub> allowance is a limited authorization to emit one ton of NO<sub>x</sub> in accordance with the CAIR NO<sub>x</sub> Annual Trading Program. No provision of the CAIR NO<sub>x</sub> Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO<sub>x</sub> allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> allowance to or from a CAIR NO<sub>x</sub> unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO<sub>x</sub> unit.

Excess Emissions Requirements.

If a CAIR NO<sub>x</sub> source emits NO<sub>x</sub> during any control period in excess of the CAIR NO<sub>x</sub> emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO<sub>x</sub> unit at the source shall surrender the CAIR NO<sub>x</sub> allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
  - (i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO<sub>x</sub> unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
  - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO<sub>x</sub> Annual Trading Program.
  - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO<sub>x</sub> Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO<sub>x</sub> Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall submit the reports required under the CAIR NO<sub>x</sub> Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

**SECTION V. CAIR PART FORM**  
**CLEAN AIR INTERSTATE RULE PROVISIONS**

Charles Larsen Memorial Power Plant

Plant Name (from STEP 1)

**STEP 3,  
Continued**

Liability.

- (1) Each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit shall meet the requirements of the CAIR NO<sub>x</sub> Annual Trading Program.
- (2) Any provision of the CAIR NO<sub>x</sub> Annual Trading Program that applies to a CAIR NO<sub>x</sub> source or the CAIR designated representative of a CAIR NO<sub>x</sub> source shall also apply to the owners and operators of such source and of the CAIR NO<sub>x</sub> units at the source.
- (3) Any provision of the CAIR NO<sub>x</sub> Annual Trading Program that applies to a CAIR NO<sub>x</sub> unit or the CAIR designated representative of a CAIR NO<sub>x</sub> unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO<sub>x</sub> Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO<sub>x</sub> source or CAIR NO<sub>x</sub> unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

**CAIR SO<sub>2</sub> TRADING PROGRAM**

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall:
  - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
  - (ii) [Reserved];
- (2) The owners and operators of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR SO<sub>2</sub> source and each SO<sub>2</sub> CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO<sub>2</sub> source with the following CAIR SO<sub>2</sub> Emission Requirements.

SO<sub>2</sub> Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO<sub>2</sub> allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO<sub>2</sub> units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
- (2) A CAIR SO<sub>2</sub> unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR SO<sub>2</sub> allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO<sub>2</sub> Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO<sub>2</sub> allowance was allocated.
- (4) CAIR SO<sub>2</sub> allowances shall be held in, deducted from, or transferred into or among CAIR SO<sub>2</sub> Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
- (5) A CAIR SO<sub>2</sub> allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO<sub>2</sub> Trading Program. No provision of the CAIR SO<sub>2</sub> Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR SO<sub>2</sub> allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO<sub>2</sub> allowance to or from a CAIR SO<sub>2</sub> unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO<sub>2</sub> unit.

Excess Emissions Requirements.

If a CAIR SO<sub>2</sub> source emits SO<sub>2</sub> during any control period in excess of the CAIR SO<sub>2</sub> emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO<sub>2</sub> unit at the source shall surrender the CAIR SO<sub>2</sub> allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

**SECTION V. CAIR PART FORM**  
**CLEAN AIR INTERSTATE RULE PROVISIONS**

Charles Larsen Memorial Power Plant

Plant Name (from STEP 1)

**STEP 3,  
Continued**

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.
- (i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO<sub>2</sub> unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.
- (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
- (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO<sub>2</sub> Trading Program.
- (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO<sub>2</sub> Trading Program or to demonstrate compliance with the requirements of the CAIR SO<sub>2</sub> Trading Program.
- (2) The CAIR designated representative of a CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall submit the reports required under the CAIR SO<sub>2</sub> Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

- (1) Each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit shall meet the requirements of the CAIR SO<sub>2</sub> Trading Program.
- (2) Any provision of the CAIR SO<sub>2</sub> Trading Program that applies to a CAIR SO<sub>2</sub> source or the CAIR designated representative of a CAIR SO<sub>2</sub> source shall also apply to the owners and operators of such source and of the CAIR SO<sub>2</sub> units at the source.
- (3) Any provision of the CAIR SO<sub>2</sub> Trading Program that applies to a CAIR SO<sub>2</sub> unit or the CAIR designated representative of a CAIR SO<sub>2</sub> unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO<sub>2</sub> Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO<sub>2</sub> source or CAIR SO<sub>2</sub> unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

**CAIR NO<sub>x</sub> OZONE SEASON TRADING PROGRAM**

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall:
- (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
- (ii) [Reserved];
- (2) The owners and operators of each CAIR NO<sub>x</sub> Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO<sub>x</sub> Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO<sub>x</sub> Ozone Season source with the following CAIR NO<sub>x</sub> Ozone Season Emissions Requirements.

NO<sub>x</sub> Ozone Season Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO<sub>x</sub> emissions for the control period from all CAIR NO<sub>x</sub> Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.
- (2) A CAIR NO<sub>x</sub> Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO<sub>x</sub> Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1),(2), or (3) and for each control period thereafter.
- (3) A CAIR NO<sub>x</sub> Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO<sub>x</sub> Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> Ozone Season allowance was allocated.
- (4) CAIR NO<sub>x</sub> Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.
- (5) A CAIR NO<sub>x</sub> Ozone Season allowance is a limited authorization to emit one ton of NO<sub>x</sub> in accordance with the CAIR NO<sub>x</sub> Ozone Season Trading Program. No provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO<sub>x</sub> Ozone Season allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a

**SECTION V. CAIR PART FORM**  
**CLEAN AIR INTERSTATE RULE PROVISIONS**

CAIR NO<sub>x</sub> Ozone Season allowance to or from a CAIR NO<sub>x</sub> Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO<sub>x</sub> Ozone Season unit.

Charles Larsen Memorial Power Plant

Plant Name (from STEP 1)

**STEP 3,  
Continued**

**Excess Emissions Requirements.**

If a CAIR NO<sub>x</sub> Ozone Season source emits NO<sub>x</sub> during any control period in excess of the CAIR NO<sub>x</sub> Ozone Season emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall surrender the CAIR NO<sub>x</sub> Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAA, the Clean Air Act, and applicable state law.

**Recordkeeping and Reporting Requirements.**

(1) Unless otherwise provided, the owners and operators of the CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.

(i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO<sub>x</sub> Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO<sub>x</sub> Ozone Season Trading Program.

(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO<sub>x</sub> Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO<sub>x</sub> Ozone Season Trading Program.

(2) The CAIR designated representative of a CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall submit the reports required under the CAIR NO<sub>x</sub> Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

**Liability.**

(1) Each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit shall meet the requirements of the CAIR NO<sub>x</sub> Ozone Season Trading Program.

(2) Any provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program that applies to a CAIR NO<sub>x</sub> Ozone Season source or the CAIR designated representative of a CAIR NO<sub>x</sub> Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO<sub>x</sub> Ozone Season units at the source.

(3) Any provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program that applies to a CAIR NO<sub>x</sub> Ozone Season unit or the CAIR designated representative of a CAIR NO<sub>x</sub> Ozone Season unit shall also apply to the owners and operators of such unit.

**Effect on Other Authorities.**

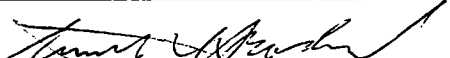
No provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO<sub>x</sub> Ozone Season source or CAIR NO<sub>x</sub> Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

**STEP 4**

**Certification (for designated representative or alternate designated representative only)**

**Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.**

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

|   |   |
|---|---|
| Name Mr. Timothy Bachand, P.E.  | Title Manager of Engineering                        |
| Company Owner Name Lakeland Electric  |   |
| Phone (863) 834-6633  | E-mail Address timothy.bachand@lakelandelectric.com |
| Signature  | Date 4/22/08  |

**Friday, Barbara**

---

**To:** timothy.bachand@lakelandelectric.com  
**Cc:** Forney.Kathleen@epamail.epa.gov; Nasca, Mara; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Attachments:** 1050003015AVCAIRNoticeofFinalPermit.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1050003.015.AV.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1050003.015.AV.F_pdf.zip)

Attention: Yousry Attalla

Owner/Company Name: LAKELAND ELECTRIC  
Facility Name: CHARLES LARSEN MEMORIAL POWER PLANT  
Project Number: 1050003-015-AV  
Permit Status: FINAL  
Permit Activity: PERMIT REVISION  
Facility County: POLK

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

## Friday, Barbara

---

**From:** Bachand, Timothy [Timothy.Bachand@lakelandelectric.com]  
**To:** Friday, Barbara  
**Sent:** Thursday, March 05, 2009 10:21 AM  
**Subject:** Read: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT;  
1050003-015-AV

Your message

**To:** [Timothy.Bachand@lakelandelectric.com](mailto:Timothy.Bachand@lakelandelectric.com)  
**Subject:**

was read on 3/5/2009 10:21 AM.

**Friday, Barbara**

---

**From:** Bachand, Timothy [Timothy.Bachand@lakelandelectric.com]  
**Sent:** Thursday, March 05, 2009 10:28 AM  
**To:** Friday, Barbara  
**Subject:** RE: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT;  
1050003-015-AV

Documents received.

Timothy L. Bachand, P.E.  
Manager of Engineering - Production  
863.834.6633 office  
863.838.4229 cell

---

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]  
**Sent:** Wednesday, February 25, 2009 9:16 AM  
**To:** Bachand, Timothy  
**Cc:** Forney.Kathleen@epamail.epa.gov; Nasca, Mara; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1050003.015.AV.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1050003.015.AV.F_pdf.zip)

Attention: Yousry Attalla

Owner/Company Name: LAKELAND ELECTRIC  
Facility Name: CHARLES LARSEN MEMORIAL POWER PLANT  
Project Number: 1050003-015-AV  
Permit Status: FINAL  
Permit Activity: PERMIT REVISION  
Facility County: POLK

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problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

## Friday, Barbara

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**From:** Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]  
**Sent:** Wednesday, February 25, 2009 9:17 AM  
**To:** Friday, Barbara  
**Subject:** Successful Mail Delivery Report  
**Attachments:** Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 49A552DF\_18115\_46042\_1 534B21DC002

<Oquendo.Ana@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 49A552DF\_18115\_46042\_1 534B21DC002

**Friday, Barbara**

---

**From:** System Administrator  
**To:** Nasca, Mara  
**Sent:** Wednesday, February 25, 2009 9:17 AM  
**Subject:** Delivered: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

Your message

**To:** [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
**Cc:** [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Sent:** 2/25/2009 9:16 AM

was delivered to the following recipient(s):

Nasca, Mara on 2/25/2009 9:17 AM

## Friday, Barbara

---

**From:** Nasca, Mara  
**To:** Friday, Barbara  
**Sent:** Wednesday, February 25, 2009 9:33 AM  
**Subject:** Read: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT;  
1050003-015-AV

Your message

**To:** [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
**Cc:** [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov);  
Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Sent:** 2/25/2009 9:16 AM

was read on 2/25/2009 9:33 AM.

## Friday, Barbara

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**From:** Nasca, Mara  
**Sent:** Wednesday, February 25, 2009 9:41 AM  
**To:** Holtom, Jonathan; Livingston, Sylvia; Friday, Barbara; Walker, Elizabeth (AIR)  
**Cc:** Zhang-Torres  
**Subject:** Fw: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Attachments:** 1050003015AVCAIRNoticeofFinalPermit.pdf

Good Morning,

As much as I love hearing from all of you, in an effort to lower my incoming emails and extra processing steps, would you please replace me on the recipient list for permits notifications with Cindy Zhang-Torres. She can then review and forward to our assistant for copy to the file.

Less process More Protection !

Thanks,  
Mara

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Sent from my BlackBerry Wireless Handheld

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**From:** Nasca, Mara  
**To:** Prickett, Patricia  
**Cc:** Zhang-Torres  
**Sent:** Wed Feb 25 09:33:15 2009  
**Subject:** Fw: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

[1 Attachment]

-----  
Sent from my BlackBerry Wireless Handheld

---

**From:** Friday, Barbara  
**To:** timothy.bachand@lakelandelectric.com  
**Cc:** Forney.Kathleen@epamail.epa.gov ; Nasca, Mara; Oquendo.Ana@epamail.epa.gov ; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Sent:** Wed Feb 25 09:16:29 2009  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

Dear Sir/ Madam:

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1050003.015.AV.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1050003.015.AV.F_pdf.zip)

Attention: Yousry Attalla

Owner/Company Name: LAKELAND ELECTRIC  
Facility Name: CHARLES LARSEN MEMORIAL POWER PLANT

Project Number: 1050003-015-AV  
Permit Status: FINAL  
Permit Activity: PERMIT REVISION  
Facility County: POLK

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Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

**Friday, Barbara**

---

**From:** System Administrator  
**To:** Attalla, Yousry; Gibson, Victoria  
**Sent:** Wednesday, February 25, 2009 9:17 AM  
**Subject:** Delivered: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

Your message

To: [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
Cc: [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
Subject: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
Sent: 2/25/2009 9:16 AM

was delivered to the following recipient(s):

Attalla, Yousry on 2/25/2009 9:17 AM  
Gibson, Victoria on 2/25/2009 9:17 AM

## Friday, Barbara

---

**From:** Attalla, Yousry  
**To:** Friday, Barbara.  
**Sent:** Wednesday, February 25, 2009 1:25 PM  
**Subject:** Read: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT;  
1050003-015-AV

Your message

**To:** [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
**Cc:** [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov);  
Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Sent:** 2/25/2009 9:16 AM

was read on 2/25/2009 1:25 PM.



## Friday, Barbara

---

**From:** Gibson, Victoria  
**To:** Friday, Barbara  
**Sent:** Wednesday, February 25, 2009 9:29 AM  
**Subject:** Read: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

Your message

**To:** [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
**Cc:** [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Sent:** 2/25/2009 9:16 AM

was read on 2/25/2009 9:29 AM.

Friday, Barbara

---

**From:** System Administrator  
**To:** Holtom, Jonathan  
**Sent:** Wednesday, February 25, 2009 9:17 AM  
**Subject:** Delivered: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV

Your message

**To:** [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
**Cc:** [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Sent:** 2/25/2009 9:16 AM

was delivered to the following recipient(s):

Holtom, Jonathan on 2/25/2009 9:17 AM

## Friday, Barbara

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**From:** Holtom, Jonathan  
**To:** Friday, Barbara  
**Sent:** Wednesday, February 25, 2009 2:14 PM  
**Subject:** Read: LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT;  
1050003-015-AV

Your message

**To:** [timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)  
**Cc:** [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nasca, Mara; [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov);  
Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan  
**Subject:** LAKELAND ELECTRIC - CHARLES LARSEN MEMORIAL POWER PLANT; 1050003-015-AV  
**Sent:** 2/25/2009 9:16 AM

was read on 2/25/2009 2:14 PM.