File original file (For Barbara)

Air, Pesticides and Toxics Management Division

United States Environmental Protection Agency

Region 4

Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303

xc: Bruce Mitchell, Ed Svec, Pat Comer

DATE: August 7, 1997

TO: **Clair Fancy** **Scott Sheplak**	**TELEPHONE:** **904/488-1344**
OFFICE: **Division of Air Resources Management** **Florida Department of Environmental Protection**	**FAX #:** **904/922-6979**
FROM: **Carla Pierce, Chief** **Operating Source Section**	**TELEPHONE:** **404/562-9099**
OFFICE: Air & Radiation Technology Branch	**PAGE 1 OF 10 PAGES**

COMMENTS:

As we discussed on the telephone earlier today, please find attached our informal comments on the proposed Title V permit for Lakeland Electric's Charles Larsen Memorial Power Plant in Lakeland, Florida. We apologize for the dissimilar formats of the two sets of attached comments. Due to problems with our computer network, we were not able to merge these two documents into one consistent comments report.

We also apologize for our lack of prior coordination with you and your staff regarding the concerns documented in these comments, and we appreciate your willingness to address our concerns. We look forward to discussing our concerns with you.

If this fax is incomplete or received poorly, please contact me at the above number.

RETURN FAX #: 404/562-9095

Section IV: Comments Summary

Draft Permit for Charles Larson Memorial Power Plant

(Comment #)	Comments Made to the Permitting Authority	Resolution
(1)	It is not clear how the source is to demonstrate continuous compliance with the opacity limit by performing annual compliance test for particulate - has an initial stack test been performed establishing parameters ?- please elaborate It is not clear whether the permit has adequate periodic monitoring requirements for opacity and particulate matter. Conditions A.22 through A.24 contain provisions for annual stack testing, but it is unlikely that an annual test alone would constitute adequate periodic monitoring for the opacity and particulate mass emission limits applicable to this source. Furthermore, the way these conditions are structured, the requirement for an annual test is waived whenever liquid and sold fuels are burned for less than 400 hours during the year. Therefore, it is unclear what information Lakeland would be using to certify compliance with the opacity and particulate mass emission limits during the years in which liquid and solid fuels are burned for fewer than 400 hours. Note: Emissions Limitations and Standards, pp.7, 13: Several paragraphs do not specifically state which compliance test is intended to be used to measure emissions. For example, Paragraphs A.5 and B.5 state that "[e]missions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually." Florida may wish to consider referencing appropriate paragraphs, located in applicable Test Methods and Procedures sections.	

DIRECTOR/APTMD ID:404-562-9066 AUG 07'97 16:44 No.006 P.02

(Comment #)	Comments Made to the Permitting Authority	Resolution
(2)	Record keeping and Reporting Requirements, pp. 11, 17: Paragraphs A.27 and B.27 state that "[a]ll recorded data" shall be maintained on file by the Source for a period of five years. This is not practically enforceable because it creates uncertainty with respect to the records acceptable to you kept, and appears to allow a source to not record data it does not want to keep, for whatever reason. Citing to specific paragraphs where data is required to be recorded would make the paragraphs more specific and practically enforceable.	
(3)	Frequency of Compliance Tests, p. 21: Paragraph C.15 indicates that "[t]he following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required." Unless it is clear that the applicability of emission standards to a particular unit does not apply, the paragraph should either exclude this language or state which of the Peaking Gas Turbines are subject to compliance testing. As it stands, the paragraph is too vague. Paragraph C.15(a)(10) states that an annual compliance test conducted for visible emissions shall not be required for units exempted from permitting. . . or units permitted under the General Permit provisions. . . ." If these provisions apply to the peaking gas turbines, then the permit should state this.	
(4)	Paragraph D.24(2)(d) requires the permittee to notify the Department of excess emissions. It should also specify when the notification should occur.	

DIRECTOR/APTMD ID:404-562-9066 AUG 07'97 16:44 No.006 P.03

(Comment #)	Comments Made to the Permitting Authority	Resolution
(5)	Paragraph D.24(4) requires the permittee to retain records for a period of three years. Section 70.6(3) requires records to be retained for at least five years.	
(6)	Test Methods and Procedures, p. 34: Paragraph E.2 discusses the number of test runs required to conduct a complete compliance test. Three runs appear to be required unless "the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate." This language seems to give the permittee a great deal of discretion in determining the number of test runs and may affect the accuracy of the results. It seems like Florida should be able to be more specific by identifying when these conditions may apply.	
(7)	As a minimum, we recommend that additional periodic monitoring should be included in Subsection E.7 of Section III (Emission Units). Specifically, daily records of fuel usage, fuel heat value, and fuel sulfur and ash content should be included for Unit #6, Unit #7, and the three peaking gas turbines.	
(8)	Subsections A.28, B.28. And D.41 of Section III reference the Common Conditions of Subsection E. For clarity, the reference should be changed from the general subsection E to the specific paragraph within the subsection.	
(9)	Please explain why FDEP switched from basing the permitted capacity of Units #6 and #7 on the high heating value of fuels)s) to using the low heating value in the permitted capacity for the combined cycle combustion turbine.	

DIRECTOR/APTMD ID:404-562-9066 AUG 07'97 16:45 No.006 P.04

(Comment #)	Comments Made to the Permitting Authority	Resolution
(10)	The General Compliance Testing requirements for Units #6 and #7 state the conditions for the required annual VE testing. We stress that the opacity limit applies at all times during operation (except for certain exempt periods) and that DEP Method 9/EPA Method 9 can be used at any of these times to document periods of noncompliance.	
(11)	Page 7, A.6: Please define how the 3-hours during any 24 hour period is determined.	
(12)	Page 7, A.8: Normal operation and operation with soot blowing are required during the annual compliance tests to demonstrate compliance with the 0.3 lb/million BTU particulate emission limit. This requirement is also applicable for load changes. How is compliance during load changes verified?	
(13)	Page 22, A.2: This condition applies to 'liquid fuel/solid fuel.' Does this fossil fuel steam generator have the capability to burn solid fuel? If it cannot, we recommend striking the words 'solid fuel' to maintain clarity.	
(14)	Page 22, C.16: Because testing is required only if operation while burning oil is greater than 400 hours, it would appear that a compliance test may not be required during the life of the permit. We recommend that this source be required to demonstrate compliance.	
(15)	Are there additional restrictions on particulate emissions? Calculations of the particulate limit for 1/3 year are as follows: 0.025 lb/MMBTU * 1040 BTU/hour * 2920 hours/year divided by 2000 lb/ton equals 37.96 tons.	

DIRECTOR/APTMD ID:404-562-9066 AUG 07'97 16:45 No.006 P.05

(Comment #)	Comments Made to the Permitting Authority	Resolution
(16)	Page 10, A.19: The permit allows use vendor fuel analysis. We recommend that the plant should randomly sample and verify the vendor's analysis.	
(17)	When the permit indicates that a particular method "shall be" used could be misunderstood by the source. Such language does not shield the source from violations of the applicable requirements established through other evidence nor does it relieve the source from violations of the applicable requirements being monitored.	
(18)	Acid Rain Part: - Please explain why unit 3 is not applicable under the Acid Rain Program - statement can be made in a "Statement of Basis" - Since unit #9 was not included in the Title V application nor on the Phase II permit application, and since your agency has determined that unit does not exist, this unit should be eliminated from the Acid Rain Part.	
(19)	Page 22, Condition C.17: it is unclear how soon after a an excess emission occurs does the source need to report to the permitting agency	

DIRECTOR/APTMD ID:404-562-9066 AUG 07'97 16:46 No.006 P.06

PROPOSED TITLE V PERMIT FOR LAKELAND ELECTRIC'S LARSEN PLANT COMMENTS BASED ON TECHNICAL REVIEW

General

1. 40 CFR Part 70 requires the permitting authority to provide EPA and any other person who requests it, a statement that sets forth the legal and factual basis for the draft permit conditions. A statement of basis was not included in the permit review package submitted to EPA for review. Items that belong in the statement of basis include the following:

   a. Background information on the facility and other information that provides the permit context;

   b. Detailed descriptions of the facility, emissions units, control devices, and manufacturing processes;

   c. Justification for streamlining of any applicable requirements, including a detailed comparison of stringency (as described in EPA's White Paper #2 dated March 5, 1996);

   d. Explanations for non-applicability determinations in instances where applicability is questionable, and the reasoning(s) for determining that units are insignificant emissions units;

   [Note: If the permitting authority makes a determination that a requirement does not apply, and decides to grant a permit shield for this condition in the permit, then the non-applicability determination needs to be included in the permit.]

   e. Notification to the source or the public about issues of concern. For example, to discuss the likelihood that a future MACT standard will apply to the source.

2. The permit does not appear to state that, where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator. [See §70.6(a)(1)(ii).]

3. The permit does not appear to provide that no permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. [See §70.6(a)(4)(i).]

4. The permit does not address the complete text of §70.6(a)(6)(I). Specifically, the permit does not state that "Any permit noncompliance constitutes a violation of the Act."

5. The permit does not appear to contain a provision stating that no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. [See §70.6(a)(8).]

6. The permit does not appear to contain terms and conditions, if the permit applicant requests them, for the trading of emissions increases and decreases in the permitted facility, to the extent that the applicable requirements provide for trading such increases and decreases without a case-by-case approval of each emissions trade. [See §70.6(a)(10).]

7. The permit should contain the mailing addresses of FDEP and EPA for the submittal of required reports, data, notifications, certifications, and requests.

8. The Larsen Plant operates both steam generators and combustion turbines by burning No. 6 fuel oil and natural gas. Currently there is no MACT standard for this industry; however, the MACT standards for industrial boilers and combustion turbines are expected to be promulgated by November 15, 2000. If the Larsen Plant is subject to these standards, it will have to show calculations for the amount of HAPs emitted and report the amount of total HAPs as well as the amount of each individual HAP emitted. This information will be used to determine if the plant is subject to the future standard and it will be required in future permits.

Section II. Facility-wide Conditions

9. Condition 4. Exempt Emissions Units and/or Activities.

   As commented on previously in correspondence dated December 5, 1996, exempting activities from permitting is inconsistent with Part 70, which only allows sources subject to Title V to avoid describing insignificant activities in the permit application. Exempting activities from permitting goes beyond the scope of the exemption contemplated by §70.5(c).

Appendix E-1 List of Exempt Emissions Units and/or Activities

10. As indicated above in comment 9, exempting activities from permitting is inconsistent with Part 70.

Appendix TV-1. Title V Conditions. (Version dated 2/27/97)

11. Condition 4: The State apparently did not include provisions for modifications for cause due to discovery of material mistake or inaccurate statements or to assure compliance with applicable requirements as outlined by §70.7(f)(1)(iii) and (iv), which are included in

condition 39. In addition, condition 4 appears to limit reopening for cause on a finding of "good cause", as defined by conditions 4(1)(a) through (c), instead of the occurrence of at least one of the four events outlined by §70.7(f)(1). To avoid a misunderstanding of these provisions, the State should consider merging conditions 4 and 39.

12. Condition 8: It is not clear if this condition is consistent with §72.83(a)(5), which requires submittal of a new certificate of representation within 30 days of a change in the owners or operators at an affected source. Condition 12(11) also pertains to permit transfers.

13. Prompt reporting of deviations from permit requirements is apparently addressed by four different permit conditions that do not contain the same information. Condition 9. requires immediate notification, but does not define "immediate". Condition 12(8) also requires immediate notification and does not define "immediate". Condition 44 requires reporting of deviations in accordance with Rules 62-210.700(6) and 62-4.130, F.A.C., with no mention of the time frame. Condition 10 contains a definition of "immediately", but it incorrectly cites Part 70 as the authority. The information in these different permit conditions should be revised for clarity and consistency.

[Note: §70.6(a)(1)(i) requires the Title V permit to "specify and reference the origin of and authority for each term or condition". As such, each term or condition must have an appropriate citation to state authority.]

14. Condition 11: The State should consider identifying this condition as a State-only requirement.

15. Condition 12 begins with the following statement: "All permits issued by the Department shall include the following general conditions..." If these are the "general provisions," then what are conditions 1 through 11 and 13 through 58?

16. Condition 12(10) needs to be revised for consistency with §70.5(c)(8)(iii)(B), which addresses federal applicable requirements.

17. Conditions 12(11) and 12(12), concerning transferability of a permit and keeping a copy of the permit on site, appear to include State-only provisions and should be identified as such.

18. Conditions 12(14)(b) and 42 regarding the retention of records of required monitoring data are identical. The State should delete one of them.

19. Conditions 12(14)(c) and condition 41 regarding records of monitoring information are the same. The State should delete one of them.

20. Condition 12(15) should be expanded to also say "... or to determine whether cause exists for modification, revoking and reissuing, or terminating the permit..." in accordance with §70.6(a)(6)(v). Condition 39.b. did not address this provision of part 70 either.

21. Conditions 17. and 55. regarding asbestos demolition or renovation are the same. The State should delete one of them.

22. Condition 18(2)(a)3.a. appears to allow for extension of the permit term until 60 days after the due date for submittal of application. Condition 18(2)(a)3.c. allows renewed permits to have terms of 10 years. Condition 4(3) also allows permits to be extended, as modifications. These conditions, however, are contradicted by condition 40 which states that permit terms for Title V sources may not be extended beyond five years. The State should consider including clarifying language in the permit regarding the provisions that are specific to Title V sources.

23. Condition 33 must be revised to prohibit changes that are modifications under Title I of the Act or that exceed the emissions allowable under the permit. [See §70.4(b)(12).]

24. Conditions 35(1)(b)3. and 4. appear to be inconsistent. The first condition places the burden of finding incorrect or incomplete information on the Department. The second condition places the burden on both the applicant and the Department. The State should consider revising these provisions for clarity

25. Condition 43: The State needs to specify the initial due date for submittal of monitoring reports by the permittee.

26. Condition 50 should be expanded to specify that, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality, as provided in §70.6(a)(6)(v).

27. Condition 51: The State should add language requiring the permittee to specify whether the compliance was continuous or intermittent, in accordance with §70.6(c)(5)(iii).

28. Condition 54 regarding open burning is not federally enforceable and should be so designated.

29. Condition 56 regarding stratospheric ozone protection does not address the technician certification requirements of §82.161 or the record keeping requirements of §82.166.

30. Condition 56(1) should reference the requirements of §82.166.

31. Condition 56(2) should reference all of the applicable requirements in 40 CFR 82, Subpart B.

32. Condition 57 is not federally enforceable and should be designated as state-enforceable only.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mr. Ronald W. Tomlin
Assistant Managing Director
Lakeland Electric & Water Utilities
501 East Lemon Street
Lakeland, Florida 33801-5079

ORDER EXTENDING PERMIT EXPIRATION DATE

Charles Larsen Memorial Power Plant. Facility I.D. No. 1050003

Section 403.0872(2)(b), Florida Statutes (F.S.), specifies that any facility which submits to the Department of Environmental Protection (Department) a timely and complete application for a Title V permit "is entitled to operate in compliance with its existing air permit pending the conclusion of proceedings associated with its application."

Section 403.0872(6), F.S., provides that a proposed Title V permit which is not objected to by the United States Environmental Protection Agency (EPA) "must become final no later than fifty-five (55) days after the date on which the proposed permit was mailed" to the EPA.

Pursuant to the Federal Acid Rain Program as defined in rule 62-210.200, Florida Administrative Code (F.A.C.), all Acid Rain permitting must become effective on January 1 of a given year.

This facility which will be permitted pursuant to section 403.0872, F.S., (Title V permit) will be required to have a permit effective date subsequent to the final processing date of the facility's Title V permit.

To prevent misunderstanding and to assure that the above identified facility continues to comply with existing permit terms and conditions until its Title V permit becomes effective, it is necessary to extend the expiration date(s) of its existing valid permit(s) until the effective date of its Title V permit. Therefore, under the authority granted to the Department by section 403.061(8), F.S., **IT IS ORDERED:**

1. The expiration date(s) of the existing valid permit(s) under which the above identified facility is currently operating is (are) hereby extended until the effective date of its permit issued pursuant to section 403.0872, F.S., (Title V permit);

2. The facility shall comply with all terms and conditions of its existing valid permit(s) until the effective date of its Title V permit;

3. The facility will continue to comply with the requirements of Chapter 62-214, F.A.C., and the Federal Acid Rain Program, as defined in rule 62-210.200, F.A.C., pending final issuance of its Title V permit.

PETITION FOR ADMINISTRATIVE REVIEW

The Department will take the action described in this Order unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes, or a party requests mediation as an alternative remedy under section 120.573, F.S., before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions must be filed within 21 days of receipt of this Order. A petitioner must 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 (or a request for mediation, as discussed below) 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 of the Florida Statutes, 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 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department 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 the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

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 Order. 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 person whose substantial interests are affected by the Department's proposed decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and

(g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57, F.S., for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57, F.S., remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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 of the Florida Statutes. 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) of the Florida Statutes, 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 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.

This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs. Upon timely filing of a petition or request for mediation, this Order will not be effective until further Order of the Department.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 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 of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

DONE AND ORDERED this 2 day of July, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

HOWARD L. RHODES, Director
Division of Air Resources Management
Twin Towers Office Building
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail before the close of business on 7/3/97 to the person(s) listed:

Ronald W. Tomlin, Lakeland Electric & Water Utilities
Bill Thomas, P.E., FDEP SWD

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.

Barbara J. Boutwell 7/3/97
(Clerk) (Date)

FLORIDA's Electronic Notification Cover Memorandum

TO: Gracy R. Danois, U.S. EPA Region 4

THRU: Scott Sheplak, P.E., Tallahassee Title V Section

FROM: Edward J. Svec, Permit Engineer, Tallahassee Title V Section

DATE: 6/23/97

RE: U.S. EPA Region 4 Title V Operation Permit Review

Pursuant to the 1996 comprehensive Title V operation permit review strategy contained in the Florida/EPA Implementation Agreement, the following Title V operation permit(s) and associated documents are made available for your review/comment prior to issuance.

Applicant Name	County	Method of Transmittal	Electronic File Name(s)
Lakeland Electric & Water Utilities	Polk	INTERNET (computer diskette) (hard copy)	1050003r.zip

This zipped file contains the following electronic files:

1050003p.doc
1050003i.doc
1050003i.me2
10500031.xls
10500032.xls
1050003e.doc
1050003u.doc
1050003h.doc
Fednot2.doc

12/5/96

n:\bar\titlev\t5tools\fednot.doc