



February 17, 1997

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32301

AIR REGULATION  
BUREAU OF  
FEB 17 1997

**RECEIVED**

RE: Lakeland Electric and Water Utilities  
Charles Larsen Memorial Power Plant  
Draft Title V Permit No. 1050003-004-AV  
Facility ID No. 105003; Polk County  
Supplemental Comments--Federally Enforceable Conditions

Dear Clair:

Lakeland Electric and Water Utilities recently submitted comments regarding the draft Title V air operation permit for the Charles Larsen Memorial Power Plant by letter dated February 7, 1997. Subsequently, the Florida Electric Power Coordinating Group, Inc. (FCG), submitted comments regarding the draft Title V general conditions (found in Appendix TV-1, Title V Conditions) on February 14, 1997. In the FCG's letter, they state that conditions based on Department rules that have no federally enforceable basis should be identified as such, consistent with draft guidance distributed at a January 30 meeting between Department and FCG representatives.

By this letter, Lakeland supplements its earlier comments and requests that the Department make the same designations in its Title V permit as suggested by the FCG in the February 14 letter (copy attached). Specifically, Conditions 1 through 18, 56, and 59 should all be designated as having no federally enforceable basis because Chapters 62-4, 62-103, and 62-256 and Rule 62-296.320(3) of the Florida Administrative Code, upon which these conditions were based, have not been approved by the U.S. Environmental Protection Agency as part of Florida's State Implementation Plan. If the Department has information indicating otherwise, please let us know. Otherwise, these conditions should be designated in our permit as not being federally enforceable.

Thank you for considering these additional comments. If you or your staff have questions, please contact me at 941-499-6603.

Sincerely,

*Farzie Shelton*  
Farzie Shelton /asm  
Environmental Coordinator

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
February 17, 1996  
Page 2

Enclosure

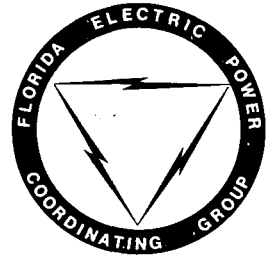
cc: Howard L. Rhodes, DEP  
John Brown, DEP  
Pat Comer, DEP OGC  
Scott M. Sheplak, DEP  
Edward Svec, DEP  
Ronald Tomlin, Lakeland  
Angela Morrison, HGSS

89767

**FLORIDA ELECTRIC POWER COORDINATING GROUP, INC. (FCG)**

405 REO STREET, SUITE 100 • (813) 289-5644 • FAX (813) 289-5646

TAMPA, FLORIDA 33609-1004



February 14, 1997

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32301

**RE: Follow-Up Comments Regarding Draft Title V Permits**

Dear Mr. Fancy:

The Florida Electric Power Coordinating Group, Inc. (FCG), appreciates the efforts of you and your staff in developing the new draft Title V permits. The information presented at our recent meeting on January 30, 1997, was very informative and helpful in resolving the concerns we expressed in our letter dated January 28. The FCG, which is made up of 36 utilities owned by investors, municipalities, and cooperatives, has been actively involved in the implementation of Title V in Florida and we want to thank you for your continued cooperation in working with us on the various issues that have arisen during this process.

As a follow-up from our January 30 meeting, we wanted to confirm our understanding of how at least two of the issues will be addressed. Additionally, we would like to obtain the Department's concurrence that certain general conditions in Title V permits should appropriately be designated as having no federally enforceable basis.

First, we would like to confirm that for units subject to the emission limit for particulate matter under Rule 62-296.405(1)(b), F.A.C., the Department intends to include language in permit conditions indicating that annual compliance testing is *not* required for natural gas firing. Rather, compliance testing would only be required once prior to permit renewal as allowed under Rule 62-297.310(7)(a)4, F.A.C. We would also like to confirm our understanding that the Department intends to enter into rulemaking within the next few months to revise Rule 62-297.310(7)(a)4 to provide that particulate matter compliance testing is not required for natural gas firing. We understand that the Department would propose this rule amendment during the "compliance simplification rulemaking" scheduled for later this year and, once the rule amendment has been adopted, would then revise any previously issued Title V permits to reflect the new rule language. Based on our discussions, we agree that it is not appropriate to conduct particulate matter compliance tests while firing natural gas, and believe that the Department's suggested approach for resolving this issue is appropriate. Please let us know if our understanding on any of these points is incorrect or if you would like our assistance with any portion of the rulemaking efforts.

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
February 14, 1997  
Page 2

Next, we would like to confirm our understanding that the Department intends to authorize the use of compliance test methods that have been approved by the U.S. Environmental Protection Agency or the Department if requested by a permit applicant through a letter permit amendment. A full revision will not be required; the amendment would simply be incorporated into the body of the permit during the next permit renewal cycle. While the Department may not include language to this effect in the permit, the Department nevertheless intends to authorize the use of different test methods than those included in the permit without a full permit revision if the methods are approved by EPA or the Department. If our understanding of this is incorrect, please let us know.

As mentioned above, we would also like to get the Department's concurrence that certain provisions in the general Title V permit conditions (referred to as Appendix TV-1, Title V Conditions) should be designated as non-federally enforceable. Our research indicates that Chapters 62-4, 62-103, and 62-256, F.A.C. (among others), have *not* been approved by the U.S. Environmental Protection Agency as part of the State Implementation Plan (SIP). Our research also indicates that Rule 62-296.320(3) regarding open burning has not been approved as part of the SIP. If your records indicate otherwise, please let us know. To the extent that these rules have not been approved as part of the SIP (or another federal program), they should not be considered "federally enforceable." Therefore, based on the draft guidance provided to us at the January 30 meeting, it would be appropriate to designate conditions based on these chapters and Rule 62-296.320(3) as "non-federally enforceable" or as having no federally enforceable basis. Specifically, Conditions 1 through 18 should be so designated, as well as Conditions 56 and 59. Again, if your records indicate that these conditions should be designated as "federally enforceable," please let us know as soon as possible.

To reiterate what we mentioned at the January 30 meeting, the FCG would like to work with the Department in an effort to resolve some remaining concerns that we have regarding annual air operating reports and the estimation of *de minimis* emissions, especially from unregulated and exempt emission units. We would like to schedule a meeting with you and Howard Rhodes sometime within the next several months to more fully explain the concerns that we have along with some suggestions as to how these concerns might appropriately be addressed.

After you and your staff have had an opportunity to review this letter, we would like to receive written confirmation as to how the first two issues will be resolved along with the Department's concurrence that certain conditions should be designated as non-federally enforceable. At a minimum, we would like to discuss these issues with you. If you or your staff have any questions or would like to discuss any of the issues raised in this letter, please call me at (561) 691-7058. Otherwise, I will contact your office within the next two weeks to

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
February 14, 1997  
Page 3

follow-up on these issues. Thank you again for your continued cooperation throughout the Title V implementation process.

Sincerely,

A handwritten signature in cursive script that reads "Rich Piper".

Rich Piper, Chair *Term*  
FCG Air Subcommittee

cc: Howard L. Rhodes, DEP  
John Brown, DEP  
Pat Comer, DEP OGC  
Scott M. Sheplak, DEP  
Edward Svec, DEP  
FCG Air Subcommittee  
Angela Morrison, HGSS

Barbara, Please clerk get.  
 when you get it, Scott  
 4/22

DEP ROUTING AND TRANSMITTAL SLIP	
TO: (NAME, OFFICE, LOCATION)	3. _____
1. <u>Clair Knney</u>	4. <u>Scott</u>
2. _____	5. _____

please copy  
 - me  
 - Ed  
 - Bruce

PLEASE PREPARE REPLY FOR:	COMMENTS:
<input type="checkbox"/> SECRETARY'S SIGNATURE	<p>Re: Revised DRAFT            Permit No. 1050003-004 AV</p> <p>Considering number of            comments and nature            Ed Svec has done a            good job.</p> <p>I plan to call Katie            Shelton as a courtesy to            inform this one's going            out the door.</p> <div style="border: 1px solid black; border-radius: 50%; padding: 5px; display: inline-block;">             call Katie              a.m.              8:00              4/23           </div>
<input type="checkbox"/> DIV/DIST DIR SIGNATURE	
<input type="checkbox"/> MY SIGNATURE	
<input checked="" type="checkbox"/> YOUR SIGNATURE	
<input type="checkbox"/> DUE DATE _____	
ACTION/DISPOSITION	
<input type="checkbox"/> DISCUSS WITH ME	
<input type="checkbox"/> COMMENTS/ADVISE	
<input type="checkbox"/> REVIEW AND RETURN	
<input type="checkbox"/> SET UP MEETING	
<input type="checkbox"/> FOR YOUR INFORMATION	
<input type="checkbox"/> HANDLE APPROPRIATELY	
<input type="checkbox"/> INITIAL AND FORWARD	
<input type="checkbox"/> SHARE WITH STAFF	
<input type="checkbox"/> FOR YOUR FILES	

FROM: <u>Scott Shepleh</u>	DATE: <u>4/22</u>	PHONE: _____
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**PROPOSED PERMIT DETERMINATION**

PROPOSED Permit No.: 1050003-004-AV

Page 1 of [#]

**DRAFT**

**I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Lakeland Electric & Water Utilities for the Charles Larsen Memorial Power Plant located at 2002 East Highway 92, Lakeland, Polk County was clerked on April 23, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Ledger on May 14, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Southwest District office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on May 21, 1997.

**II. Public Comment(s).**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from [number] respondent(s) during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Letter from Ms. Farzie Shelton dated May 13, 1997, and received on May 13, 1997.

1. R: The City requested in a supplemental submittal to their original application that propane and No. 2 fuel oil be included in the Title V permit as startup fuels. There was no indication in any submittal that the fuels permitted for normal operation would also be employed as startup fuels. However, since the affected units are regulated under Rule 62-295.405, F.A.C., which limits emissions by a pound value per million Btu heat input, the Department does not object to the inclusion of these fuels with the requested startup fuels. As a result of this comment, specific conditions A.3. and B.3. are changed as follows:

**From:**

**A.3. Methods of Operation. Fuel(s).**

- a. Startup: The only fuels allowed to be burned are propane or No. 2 fuel oil.
  - b. Normal: The only fuels allowed to be burned are natural gas, No. 6 fuel oil, or a combination of natural gas and No. 6 fuel oil. When a blend of fuel oil and natural gas is fired, the heat input is prorated based on the percent heat input of each fuel.
- [Rule 62-213.410, F.A.C.]

PROPOSED Permit No.: 1050003-004-AV

Page 2 of [#]

**DRAFT**

**B.3. Methods of Operation. Fuel(s).**

- a. Startup: The only fuels allowed to be burned are propane or No. 2 fuel oil.
  - b. Normal: The only fuels allowed to be burned are natural gas, No. 6 fuel oil, or a combination of natural gas and No. 6 fuel oil. When a blend of fuel oil and natural gas is fired, the heat input is prorated based on the percent heat input of each fuel.
- [Rule 62-213.410, F.A.C.]

To:

**A.3. Methods of Operation. Fuel(s).**

- a. Startup: The only fuels allowed to be burned are propane, No. 2 fuel oil, natural gas, No. 6 fuel oil, or any combination of these fuels.
  - b. Normal: The only fuels allowed to be burned are natural gas, No. 6 fuel oil, or a combination of natural gas and No. 6 fuel oil. When a blend of liquid and gaseous fuel is fired, the heat input is prorated based on the percent heat input of each fuel.
- [Rule 62-213.410, F.A.C.]

**B.3. Methods of Operation. Fuel(s).**

- a. Startup: The only fuels allowed to be burned are propane, No. 2 fuel oil, natural gas, No. 6 fuel oil, or any combination of these fuels.
  - b. Normal: The only fuels allowed to be burned are natural gas, No. 6 fuel oil, or a combination of natural gas and No. 6 fuel oil. When a blend of liquid and gaseous fuel is fired, the heat input is prorated based on the percent heat input of each fuel.
- [Rule 62-213.410, F.A.C.]

2. R: The comment requesting the standard for sulfur dioxide be changed to a three-hour standard has been withdrawn by the representative of the City of Lakeland at a meeting held on June 16, 1997.

The Department does not agree that the maximum heat input specified by the permittee in the Title V application should be a three hour average. This value is a not to exceed maximum and will remain unchanged.

The City also requests that the fuel heating value and the fuel flow meter be identified as a compliance method in the permit conditions. Although the Department feels that common condition E.1., which addresses the required equipment and its accuracy for the determination of process variables, adequately addresses this concern, language will be added to the conditions addressing capacity for Units 6 and 7. As a result of this comment, specific conditions A.1. and B.1. are changed, as follows:



PROPOSED Permit No.: 1050003-004-AV

Page 3 of [#]

**DRAFT****From:****A.1. Permitted Capacity.** The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat</u>	<u>Fuel Type</u>
	<u>Input</u>	
6	286.5	Natural Gas
	305.9	No. 6 Fuel Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

**B.1. Permitted Capacity.** The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat</u>	<u>Fuel Type</u>
	<u>Input</u>	
7	615.6	Natural Gas
	597.6	No. 6 Fuel Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

**To:****A.1. Permitted Capacity.** The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat</u>	<u>Fuel Type</u>
	<u>Input</u>	
6	286.5 (HHV)	Natural Gas
	305.9 (HHV)	No. 6 Fuel Oil

Compliance with the heat input limits shall be determined based on the higher heating value (HHV) of the fuels used and fuel flow meter data.

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

**B.1. Permitted Capacity.** The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat</u>	<u>Fuel Type</u>
	<u>Input</u>	
7	615.6 (HHV)	Natural Gas
	597.6 (HHV)	No. 6 Fuel Oil

Compliance with the heat input limits shall be determined based on the higher heating value (HHV) of the fuels used and fuel flow meter data.

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

**3. R:** The EPA has commented previously that the fuel analyses methods are federally enforceable and this change will not be made. However, the Department agrees that the permittee can also provide the fuel analysis. As a result of this comment, specific conditions A.14., B.14., and C.9. are changed as follows:

PROPOSED Permit No.: 1050003-004-AV  
Page 4 of [#]

**DRAFT**

**From:**

**A.14. Sulfur Dioxide.** The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**B.14. Sulfur Dioxide.** The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions B.10., B.19. and B.20.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**C.9.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition C.12.

[Rule 62-213.440, F.A.C.]

**To:**

**A.14. Sulfur Dioxide.** The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**B.14. Sulfur Dioxide.** The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions B.10., B.19. and B.20.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**C.9.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or the permittee upon each fuel delivery. See specific condition C.12.

[Rule 62-213.440, F.A.C.]

**DRAFT**

PROPOSED Permit No.: 1050003-004-AV

Page 5 of [#]

4. R: It is the Department's intent that the heat input rates become federally enforceable in that the rates define the capacity of the units for purposes of establishing emission limits, establishing unit capacity for testing purposes, and establishing a base for the determination of future rule applicability.

The Department recognizes that heat input curves for the gas turbines have been submitted with the Title V application. These conditions require that the curves be submitted with the compliance test report when the units are tested at less than capacity. The condition will remain as noticed. However, the Department agrees that the heat inputs for the turbines should reference a temperature. The Department was informed in the meeting of June 16, 1997, that the temperature requested by the City of Lakeland in their comment letter was incorrect and did not agree with the turbine curves. The City of Lakeland provided the correct values in a letter received June 17, 1997. The Department assumes that this submittal now contains the correct information. As a result of this comment, specific conditions C.1. and D.1. are changed as follows:

From:

C.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
3	209	Natural Gas
	209	No. 2 Fuel Oil
2	209	Natural Gas
	209	No. 2 Fuel Oil
1	209	Natural Gas
	209	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

D.1. Permitted Capacity. The maximum process/operation rate is 1055 MMBtu per hour (lower heating value) heat input firing natural gas and 1040 MMBtu per hour (lower heating value) heat input firing No. 2 distillate oil.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

To:

25

C.1. Permitted Capacity. The maximum operation heat input rates, at an inlet temperature of 25 degrees F when firing natural gas and at an inlet temperature of 20 degrees F when firing No. 2 fuel oil, are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
3	209	Natural Gas
	209	No. 2 Fuel Oil
2	209	Natural Gas
	209	No. 2 Fuel Oil
1	209	Natural Gas
	209	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

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PROPOSED Permit No.: 1050003-004-AV

Page 6 of [#]

**D.1. Permitted Capacity.** The maximum process/operation rate, at an inlet temperature of 25 degrees F, is 1055 MMBtu per hour (lower heating value) heat input firing natural gas or 1040 MMBtu per hour (lower heating value) heat input firing No. 2 distillate oil. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

5. R: These emissions limits were in the PSD permit and some of the limits were established by the BACT process (such as the short term carbon monoxide limit). They remain applicable requirements until they are deleted from the permit. To avoid any confusion, the word "by" will be added to specific condition D.31. As a result of this comment, specific condition D.31. will be changed as follows:

From:

**D.31. Sulfuric Acid Mist.** Compliance with the sulfuric acid mist standard shall be demonstrated using natural gas or 0.2 percent sulfur, by weight, No. 2 distillate oil. [Rules 62-213.440, 62-297.310, and 62-297.401, F.A.C. and, PSD-FL-166]

To:

**D.31. Sulfuric Acid Mist.** Compliance with the sulfuric acid mist standard shall be demonstrated by using natural gas or 0.2 percent sulfur, by weight, No. 2 distillate oil. [Rules 62-213.440, 62-297.310, and 62-297.401, F.A.C.; and, PSD-FL-166]

6. R: Specific condition D.26. addresses the monitoring device that determines the fuel consumption and the water-to-fuel ratio which shows compliance at the four loads. The monitoring device will be gauged to the four loads which have been ISO corrected. The emissions are not ISO corrected. Specific condition D.27. sets the test method for showing compliance with the nitrogen oxides and sulfur dioxide standards. Since these conditions are quotes of 40 CFR 60, the language cannot be changed by the Department. The Department will add a permitting note and an additional specific condition which will clarify the requirements of annual compliance testing of nitrogen oxides. As a result of this comment, a permitting note will be added following the emission limits for nitrogen oxides and an additional specific condition addressing annual compliance for nitrogen oxides will be added.

Add:

{Permitting note: Since the BACT limit established for nitrogen oxides is more stringent than the NSPS limit, compliance with the nitrogen oxides BACT limits of specific conditions D.4. and D.5. is assumed to show compliance with the nitrogen oxides limit of 40 CFR 60.332.}

**DRAFT**

**D.28.** Initial compliance with the nitrogen oxides limit pursuant to 40 CFR 60.8 was conducted August 3-7, 1992. For annual compliance purposes, compliance with the nitrogen oxides limits of specific conditions **D.4.** and **D.5.** will be determined using EPA Method 20 and testing at capacity as defined by specific condition **D.36.** Correction to ISO conditions is not required for the annual compliance test.  
[Rule 62-297.310, F.A.C.]

The addition of new specific condition **D.28.** will also require the renumbering of all the specific conditions following the new condition.

**7. R:** Both emissions units are permitted to fire either natural gas or fuel oil for 8,760 hours per year. The frequency for particulate matter testing when firing fuel oil is set in Chapter 62-297, F.A.C. The authority to grant an ASP is also contained in Rule 62-297.620, F.A.C. The "and" statement implies that there can be requirements in Chapter 62-297, F.A.C., that allow for less than annual particulate testing. The conditions will remain as noticed.

**8. R:** Under the current rules, the requirements of a Standards of Performance for New Stationary Sources (NSPS) and the State's excess emissions rules are separate. The requirements from all applicable rules are to be incorporated in a Title V permit. Since this emissions unit is regulated for pollutants in addition to those regulated by the Subpart, both the NSPS excess emission requirements and the State's excess emission provisions apply to this emissions unit. If the NSPS, as claimed in the comment, does not limit the period of excess emissions, then the State's requirements would be applicable because they limit the duration of a malfunction to two hours in a 24 hour period and startup/shutdown excess emissions to a duration based on best operational practices. Both the state and federal requirements would apply to the emissions unit. The conditions will remain as noticed.

**9. R:** The Department acknowledges the comments on the summary tables. The requirement for no particulate matter stack test when firing natural gas is referenced in the "See Permit Conditions" column. The duration of a stack test is one hour and it is repeated three times. Visible emissions tests are required regardless of the type of fuel fired. Rules require that testing be performed prior to permit renewal, at a minimum. The frequency base date is not affected by the fact that no future testing is required. The tables are general summaries of the permit and are to be used for informational purposes, only. The corresponding permit condition reference is included for the convenience of the user of the table. The tables were never meant to address every possible operating scenario.

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PROPOSED Permit No.: 1050003-004-AV

Page 8 of [#]

The City of Lakeland has again requested that the frequency base date in Table 2-1 be changed for emissions units ID -003 and -004 (a.k.a. Units Nos. 6 and 7). This REVISED DRAFT Permit was issued because of the volume of comments received from the City of Lakeland on the DRAFT Permit. In their comment letter received December 4, 1996, and a follow-up letter received February 10, 1997, the City of Lakeland requested dates of May 30 for emission unit 003 and June 30 for emission unit 004 "to be consistent with the most current permits for the Larsen units". Now they want the date changed to July 1 so that the date will be consistent with a permit amendment dated April 19, 1996. The Department will again change the frequency base dates in Table 2-1 for emissions units -003 and -004 to July 1.

**10. R:** These conditions have been researched and all current conditions that have not been flagged are either part of the State Implementation Plan or a Federally Delegated Program, such as Title V. The comment on Rule 62-4.040(1)(a), F.A.C., was withdrawn by a representative of the City of Lakeland at a meeting on June 16, 1997. The conditions contained in Appendix TV-1, Title V Conditions will remain as noticed.

**11. R:** The Department acknowledges the comment. When the changes are made to the construction permit, the Title V permit will need to be revised to incorporate the revised conditions.

The enclosed PROPOSED Title V Air Operation Permit includes the aforementioned changes to the DRAFT Title V Air Operation Permit.

**B. Document(s) on file with the permitting authority:**

- Letter received May 13, 1997, from Ms. Farzie Shelton.
- Letter received June 17, 1997, from Ms. Farzie Shelton.

**III. Conclusion.**

The permitting authority will issue the PROPOSED Permit No.: 1050003-004-AV, with any changes noted above.

TO Barbara 1/22/97  
DATE 1/21/97 TIME 2 pm copy made  
**WHILE YOU WERE OUT** up  
M Helen typical  
of Angela Marrison's office lay  
PHONE 425-2258 marker  
AREA CODE NUMBER EXTENSION

TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	<input checked="" type="checkbox"/> WILL CALL AGAIN
RETURNED YOUR CALL	CALL IMMEDIATELY	
CAME TO SEE YOU	WANTS TO SEE YOU	

*copy of SWD off*  
MESSAGE Any add'l comments  
received? on Likeland's  
DRAFT TIL V permit.  
SWD comments (3 pages)  
Voicemail  
by Scott