



Farzie Shelton, chE; REM

Manager of Environmental Affairs

October 10, 2002

RECEIVED

OCT 15 2002

Scott Sheplak, P.E. Administrator  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Re: Comments on Draft Permit Renewal No. 1050003-011-AV  
City of Lakeland's Charles Larsen Memorial Power Plant

Dear Mr. Sheplak:

We are in receipt of the above referenced draft permit and the following are Lakeland Electric's comments regarding this permit. We thank you for your continued cooperation in this process and understand the need to expedite the resolution of these issues. Therefore, we look forward to hearing from you at your earliest convenience to discuss this matter.

**Permitting Notes regarding heat input rates.** Lakeland requests the replacement of the permitting notes with an specific condition at the end of specific conditions A.1, B.1, C.1, and D.1 with the following language to be added at the end of these actual conditions. Based on discussions between the Florida Electric Power Coordinating Group and the Department, we understand that this concept is necessary to clarify these conditions. The following language is intended to be substantively the same as the existing permitting notes.

This heat input rate has been placed in this permit to identify the capacity of this unit during testing, to confirm that testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load). See Condition A.21 [or B.21, C.13, or D.36]. This rate is not a limit and therefore regular record keeping is not required. Instead the owner or operator is expected to determine the heat input rate whenever stack emission testing is required, to demonstrate at what percentage of the rated capacity that the unit is tested. Rule 62-297.310(5), F.A.C., included in this permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate the average hourly heat input during the test.

Sincerely,

Farzie Shelton

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • (863) 834-6603 • Fax (863) 834-8187 • Message System 834-6592

farzie.shelton@lakelandgov.net



**MICHAEL S. CRAIG**  
ASSISTANT CITY ATTORNEY  
228 S. Massachusetts Avenue  
Lakeland, Florida 33801  
BUS: (863) 834-6010  
FAX: (863) 834-8204  
e-mail - michael.craig@lakelandgov.net

-file-

November 13, 2002

VIA Facsimile 850-245-2302

**RECEIVED**

**NOV 13 2002**

Doug Beason, Esquire  
Office of General Counsel  
Department of Environmental Protection  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

**BUREAU OF AIR REGULATION**

RE: City of Lakeland v Department of Environmental Protection  
FDEP Draft Permit No. 1050003-011-AV

Dear Mr. Beason:

Please be advised that the City of Lakeland, Florida, hereby withdraws its Petition for Administrative Hearing filed on November 1, 2002. If anything further is needed, please do not hesitate to call.

Sincerely,

  
Michael S. Craig  
Assistant City Attorney

MSC/aw

xc: Scott Sheplack



Farzie Shelton, chE; REM

Manager of Environmental Affairs

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OCT 15 2002

October 14, 2002

BUREAU OF AIR REGULATION

Scott Sheplak, P.E. Administrator  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

**Re: Comments on Draft Permit Renewal No. 1050003-011-AV  
City of Lakeland's Charles Larsen Memorial Power Plant**

Dear Mr. Sheplak:

On October 10, 2002 Lakeland Electric (Lakeland) submitted a comment in reference to the above as follows:

**Permitting Notes regarding heat input rates.** Lakeland requests the replacement of the permitting notes with a specific condition at the end of specific conditions A.1, B.1, C.1, and D.1 with the following language to be added at the end of these actual conditions. Based on discussions between the Florida Electric Power Coordinating Group and the Department, we understand that this concept is necessary to clarify these conditions. The following language is intended to be substantively the same as the existing permitting notes.

This heat input rate has been placed in this permit to identify the capacity of this unit during testing, to confirm that testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load). See Condition A.21 [or B.21, C.13, or D.36]. This rate is not a limit and therefore regular record keeping is not required. Instead the owner or operator is expected to determine the heat input rate whenever stack emission testing is required, to demonstrate at what percentage of the rated capacity that the unit is tested. Rule 62-297.310(5), F.A.C., included in this permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate the average hourly heat input during the test.

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Scott Sheplak, P.E. Administrator  
Bureau of Air Regulation

October 14, 2002

Page 2 of 2

In further examination of the draft permit and our application, we have noticed certain conditions that would need to be modified in this draft permit. Therefore, today we are writing to request an addendum to our letter of October 10, 2002 to include the following:

Permit page or Condition	Comments or request from Title V application
Placard page	Change Expiration date to <b>December 31, 2007</b>
5	Change DEP SWD fax number to 813/744- <b>6458</b>
A.11	Insert: ...resulting from ' <b>startup, shutdown or</b> ' malfunction shall be...
B.11	Insert: ...resulting from ' <b>startup, shutdown or</b> ' malfunction shall be...
D.4	Request from application to also include <b>105 lb/hr</b>
D.5	Request from application to also include <b>176 lb/hr</b>
D.6	Request from application to also include <b>0.0019 lb/MMBtu</b>
D.7	Request from application to also include <b>211 lb/hr</b>
D.10	Request from application to also include <b>1.73E-4 lb/MMBtu</b>
D.11	Request from application to also include <b>0.006 lb/MMBtu</b>
D.13	Request from application to also include <b>0.0018 lb/MMBtu</b> for natural gas and <b>0.0045 lb/MMBtu</b> for oil
D.15 – D.17	Application did not include <b>mercury, lead, or beryllium</b> . Golder (Ken Kosky) was going to speak to Al Linero regarding the removal of these pollutants from the Title V permit.
D.27 & D.28	Request from application to also include <b>EPA Method 7E</b> (annual testing)

Your cooperation in this matter is much appreciated. Please call me if you should have any questions.

Sincerely,



Farzie Shelton

City of Lakeland • Department of Electric Utilities

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Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Certified Mail – Return Receipt Requested

David B. Struhs  
Secretary

July 25, 2002

Mr. Keith Hulbert  
General Manager and Responsible Official  
Lakeland Electric  
501 East Lemon Street  
Lakeland, Florida 33801-5079

Re: Title V Air Operation Permit Renewal Application  
**Charles Larsen Memorial Power Plant**  
Facility ID: **105003**; ORIS Code: **0675**

Dear Mr. Hulbert:

Thank you for your recent submission of a Title V Air Operation Permit Renewal Application for the referenced plant. However, we must deem your application *incomplete*, due to the omission of an updated Phase II Acid Rain Part Application. Please be advised that Department Rule 62-214.320(1)(i), F.A.C. requires that, "the designated representative of any Title V source having a Title V permit with an Acid Rain Part shall submit a complete application for renewal of the Title V permit with the Acid Rain Part for each Acid Rain unit at the source."

Also, please check if there are any changes to the Designated Representative for the facility, and submit an updated Certificate of Representation if necessary.

When we receive this information we will continue processing your application. If you have any questions, please contact Edward J. Svec at 850/921-8985.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section

Cc: Kennard Kosky, P.E., Golder Associates  
Gerald Kissel, P.E., DEP SWD

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

Mr. Keith Hulbert

Postage \$  
Certified Fee  
Return Receipt Fee  
(Endorsement Required)  
Restricted Delivery Fee  
(Endorsement Required)  
Total Postage & Fees \$

Postmark  
Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)

Mr. Keith Hulbert

Street, Apt. No., or PO Box No.

501 East Lemon Street

City, State, ZIP+4

Lakeland, Florida 33801-5079

PS Form 3800, February 2000

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Keith Hulbert  
General Manager and Responsible Official  
Lakeland Electric  
501 East Lemon Street  
Lakeland, Florida 33801-5079

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

Rebecca LeCompte 7-19-01

C. Signature

Rebecca LeCompte

☐ Agent  
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label)

7000 0520 0020 9371 3278

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

**RESPONSIBLE OFFICIAL NOTIFICATION FORM**

**Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.**

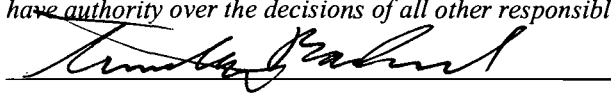
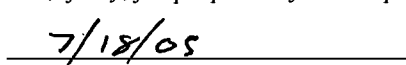
**Identification of Facility**

1. Facility Owner/Company Name: <b>Lakeland Electric</b>	
2. Site Name: <b>McIntosh power Plant</b>	3. County: <b>Polk</b>
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): <b>1050004-016-AV</b>	

**Notification Type (Check one or more)**

<input type="checkbox"/> <b>INITIAL:</b>	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> <b>RENEWAL:</b>	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> <b>CHANGE:</b>	Notification of change in responsible official(s). Effective date of change in responsible official(s) _____

**Primary Responsible Official**

1. Name and Position Title of Responsible Official: <b>Timothy Bachand</b>
2. Responsible Official Mailing Address: Organization/Firm: <b>Lakeland Electric</b> Street Address: <b>501 East Lemon Street</b> City: <b>Lakeland</b> State: <b>Florida</b> Zip Code: <b>33801</b>
3. Responsible Official Telephone Numbers: Telephone: <b>(863 )834 - 6633</b> Fax: <b>(683 ) 634 - 5670</b>
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement:  <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>    Signature Date

**Additional Responsible Official**

1. Name and Position Title of Responsible Official: <b>To be elected at later date</b>		
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:		
3. Responsible Official Telephone Numbers: Telephone: Fax:		
4. Responsible Official Qualification ( <i>Check one or more of the following options, as applicable</i> ): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.		

**Additional Responsible Official**

1. Name and Position Title of Responsible Official:		
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Florida Zip Code:		
3. Responsible Official Telephone Numbers: Telephone: ( ) - Fax: ( ) -		
4. Responsible Official Qualification ( <i>Check one or more of the following options, as applicable</i> ): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.		





Farzie Shelton, chE; REM

Manager of Environmental Affairs

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

July 18, 2005

Ms. Trina L. Vielhauer  
Chief, Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road, Mail Station #5505  
Tallahassee, Florida 32399-2400

RECEIVED  
JUL 22 2005  
BUREAU OF AIR REGULATION

**Re: Notice of Responsible Officials – Lakeland Electric  
Title V facilities C. D. McIntosh Power Plant 1050004-016-AV  
Charles Larsen Memorial Power plant 1050003-011-AV  
And Winston Peaking Station 1050352-002-AV**

Dear Ms. Vielhauer:

In compliance with Rule 62-210.200 and 62-213 F.A.C., notice is hereby given that The Lakeland Electric (Lakeland) has, by agreement, appointed Mr. Timothy Bachand as the Primary Responsible Official. However, at this time, Lakeland would reserve the right to elect additional Responsible Officials at a later date for its above referenced Title V facilities. Lakeland is the owner/operator of these Title V facilities. Mr. Bachand has the necessary authority to carry out the duties and responsibilities of the Title V Program under the Clean Air Act Amendments of 1990 on behalf of Lakeland Electric.

This notice is made in accordance with the Clean Air Act, as amended and applicable regulations promulgated thereto by the United States Environmental Protection Agency and the Florida Department of Environmental Protection. Therefore, enclosed you will find certifications signed by Mr. Bachand declaring his appointment.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

Farzie Shelton

Enclosures

Cc: Mr. Jason Waters P.E. – DEP Southwest District  
Mr. Timothy Bachand, P.E.

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Message System 834.6590

[farzie.shelton@lakelandelectric.com](mailto:farzie.shelton@lakelandelectric.com)