

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



File Polk 6-AP

A053-6631

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

DAVID PUCHATY
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

December 19, 1979

Mr. Mike Opalinski
Environmental Coordinator
City of Lakeland
McIntosh Plant Construction Office
Post Office Box 3523
Lakeland, Fla. 33802

Dear Mr. Opalinski:

This office has reviewed your letter of December 11, 1979 requesting amendment of the City of Lakeland-Larsen Memorial Power Plant, Units 5, 6, & 7 air permits to allow the burning of up to 2.5% sulfur fuel. Please be advised it will be necessary for you to submit applications for a permit modification.

Any increase in the sulfur content of oil or switch from natural gas to oil will increase emissions and it has been determined this will consume a portion of the applicable PSD increment. Thus any application for modification of a permit to allow such a change in fuel will require an analysis of the impact on PSD increments as well as ambient air quality standards. A BACT determination is not required. It is suggested prior to initiating the modeling work that you contact Mr. Larry George, Bureau of Air Quality Management - Tallahassee, (904-488-1344) to discuss the Department requirements in this area.

If you have any questions please do not hesitate to contact our office.

Sincerely,

Dan A. Williams, P.E.
District Air Engineer

DAW/rkt

cc: P. David Puchaty
R. Craig McArthur
Steve Smallwood
Larry George
Mary Clark

original typed on 100% recycled paper



City of Lakeland

WORLD CITRUS CENTER

LAKELAND, FLORIDA 33802

December 11, 1979

McIntosh Plant Construction Office

P.O. Box 3523

Lakeland, Florida 33802

(813) 688-2531

Larsen Pl. O

D.E.R.

DEC 12 1979

**SOUTHWEST DISTRICT
TAMPA**

Mr. Bill Brown
Fl. Dept. of Env. Regulation
Southwest District
7601 Highway 301 North
Tampa, Fl. 33610

Dear Sir:

During the last several months, the City of Lakeland has conducted compliance particulate emissions tests on Units 5, 6 and 7 at the Larsen Memorial Power Plant while burning high sulfur oil. In each test, the results showed that the units met the particulate emission limitation of 0.1 lb/mm BTU.

These units can legally burn up to 2.5% sulfur fuel and comply with SO₂ emission standard outlined in Chapter 17-2 FAC, but have been burning and are permitted to burn only low sulfur oil. However, recent fuel oil price increases have raised the cost differential between 1% and 2.5% sulfur oil to \$6.42 per barrel, no longer making it economically feasible to continue the burning of low sulfur oil.

For this reason, we request that the following Larsen Plant permits be amended to allow the use of high sulfur oil:

| UNIT # | PERMIT # | % S OIL | SO ₂ EMISSIONS (lbs/mm BTU)* |
|--------|-----------|---------|---|
| 5 | A053-6631 | 2.5 | 2.43 |
| 6 | A053-6632 | 2.5 | 2.43 |
| 7 | A053-6633 | 2.5 | 2.43 |

*Emissions are based on 2.5% Sulfur oil with a heating value of 18500 BTU/lb with a 90% SO₂ emission factor.

Since the stated cost differential is now in effect, we would greatly appreciate your most expeditious handling of this matter. If you have any questions, please contact me.

Sincerely,

Mike Opalinski

Mike Opalinski
Environmental Coordinator
Power Generation Division

No.

12/12/79
Branch on
12/18



7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



File: Polk Co - AP

AD53-6633

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

DAVID PUCHATY
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

December 19, 1979

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City of Lakeland
McIntosh Plant Construction Office
Post Office Box 3523
Lakeland, Fla. 33802

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District Air Engineer

DAW/rkt

cc: P. David Puchaty
R. Craig McArthur
Steve Smallwood
Larry George
Mary Clark

original typed on 100% recycled paper



City of Lakeland

WORLD CITRUS CENTER

LAKELAND, FLORIDA 33802

December 11, 1979

File: PRR G-AP
Reply mailed: 12/19/79
McIntosh Plant Construction Office
P.O. Box 3523
Lakeland, Florida 33802
(813) 688-2531
bn

D.E.R.

DEC 12 1979

**SOUTHWEST DISTRICT
TAMPA**

Mr. Bill Brown
Fl. Dept. of Env. Regulation
Southwest District
7601 Highway 301 North
Tampa, Fl. 33610

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Sincerely,

Mike Opalinski

Mike Opalinski
Environmental Coordinator
Power Generation Division

682 1161





City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

December 17, 1979

File: P/LK 6-AP ✓ RPB

McIntosh Plant Construction Office

P.O. Box 3523
Lakeland, Florida 33802
(813) 688-2531

D.E.R.

DEC 20 1979

SOUTHWEST DISTRICT
TAMPA

Mr. Bob Barker
Fl. Dept. of Env. Regulation
Southwest District
7601 Highway 301 North
Tampa, Fl. 33610

Dear Bob:

Per your request, please find the attached high sulfur fuel oil analysis taken from the Larsen Plant Storage Tanks.

If I can be of any other assistance, please contact either myself or Mike Gieger.

Sincerely,

Mike Opalinski

Mike Opalinski
Env. Coord.

MO/csh



D.E.R.

DEC 20 1979

SOUTHWEST DISTRICT
TAMPA

FULL OIL

DATE 11-6-79

SAMPLE NO. H/S (2.5%) E. Tank-LARSEN Pl. - Pump Discharge
NO. 10 Boiler

TYPE H/S NO: 6

#5 ↗

APPEARANCE _____

ASTM COLOR _____

VISCOSITY, SSF @ 122 F _____

VISCOSITY, SUS @ 100 F _____
210 F _____

API GRAVITY @ 60 F 16.4

SPECIFIC GRAVITY @ 60 F 0.9567

WT. PER GALLON 7.967

WATER % by V _____

SEDIMENT % by WT. _____

SEDIMENT % BY V _____

SULFUR % by Wt. 2.26

BTU PER lb. 18,540

BTU PER GALLON 147,708

Ash % = 0.07

NO. 5 ↘

REMARKS Stack Testing - NO. 10 Boiler

Stack Appearance @ 9:00 AM - clear

ORIFICE & DRY GAS METER CALIBRATION

| | |
|--|--|
| Date <u>10-20-79</u> | Barometric Press, P_B <u>30.08</u> "H _g |
| By <u>C. J. McDONALD - PRECISION REPAIRS</u> | Dry Gas Meter No. <u>647188</u> |
| Company <u>CITY OF LAKE LAND</u> | Wet Test Meter No. <u>P675</u> |
| Checked <u>[Signature]</u> | Leak Test @ 15 "H _g <u>0.000</u> CFM |

| Orifice Manometer Setting, ΔH , "H ₂ O | Gas Vol. Wet Test Meter V_w , Ft ³ | Gas Vol. Dry Gas Meter V_d , Ft ³ | TEMPERATURE | | | | Time θ Min. | Y | ΔH_0 |
|---|---|--|----------------------|-----------------------|------------------------|------------------------|------------------------------|--------|--------------|
| | | | Wet Test | Dry Gas Meter | | | | | |
| | | | Meter $t_{w, OF}$ | Inlet $t_{di, OF}$ | Outlet $t_{do, OF}$ | Average $t_{d, OF}$ | | | |
| 0.5 | 3.759 | 3.793 | 77.8 | 94.0 | 87.0 | 90.5 | 10 | 1.0132 | 1.9718 |
| 1.0 | 5.176 | 5.260 | 77.9 | 97.0 | 87.0 | 92.0 | 10 | 1.0074 | 2.0807 |
| 2.0 | 7.125 | 7.245 | 78.0 | 101.0 | 88.0 | 94.5 | 10 | 1.0087 | 2.1929 |
| 4.0 | 9.940 | 10.134 | 77.8 | 105.0 | 88.0 | 96.5 | 10 | 1.0051 | 2.2518 |
| 6.0 | 12.149 | 12.487 | 77.1 | 108.0 | 91.0 | 99.5 | 10 | .9989 | 2.2429 |
| 8.0 | 13.950 | 14.334 | 77.0 | 109.0 | 92.0 | 100.5 | 10 | .9963 | 2.2632 |
| Avg. | | | | | | | | 1.0049 | |

CALCULATIONS

| ΔH | $\frac{\Delta H}{13.6}$ | Y | ΔH |
|------------|-------------------------|---|--|
| | | $\frac{V_w P_b (t_d + 460)}{V_d (P_b + \frac{\Delta H}{13.6}) (t_w + 460)}$ | $\frac{0.0317 \Delta H}{P_b (t_{do} + 460)} \left[\frac{(t_w + 460) \theta}{V_w} \right]^2$ |
| 0.5 | 0.0368 | 1.013 | 1.9718 |
| 1.0 | 0.0737 | 1.0074 | 2.0807 |
| 2.0 | 0.147 | 1.0087 | 2.1929 |
| 4.0 | 0.294 | 1.0051 | 2.2518 |
| 6.0 | 0.431 | 0.9919 | 2.2429 |
| 8.0 | 0.588 | 0.9963 | 2.2632 |
| Avg. | | 1.0037 | 2.1672 |

Y = Ratio of accuracy of wet test meter to dry test meter = ± 0.01

ΔH_0 = Orifice press. Diff. that gives 0.75 cfm air at 70°F and 29.92 "H_g,
"H₂O. Tolerance = ± 0.15 .

Meter to be tested should be run 10 min. @ 2 "H₂O prior to calibrating.

METER # 647188

CALIBRATION WORK SHEET

DATE

10-20-79

| IN. Δ H | WTM | Tw | DGM | T _d _i | T _d _o | T _d | Time Min | Factor |
|-------------------|-----------------------------------|------|---------------------------------------|-----------------------------|-----------------------------|----------------|-------------|--------|
| .5 | <u>3.759</u> 000.000 3.759 | 77.8 | <u>969.687</u> 965.634 3.793 | 94.0 | 87.0 | 90.5 | 10 | 1.0132 |
| | <u>3.759</u> X 30.08 X | | <u>550.5</u> | | | | | |
| | <u>3.793</u> X 30.12 X | | <u>537.8</u> | | | | | |
| 1.0 | <u>8.935</u> 3.759 5.176 | 77.9 | <u>974.687</u> 969.427 5.260 | 97.0 | 87.0 | 92.0 | 10 | 1.0074 |
| | <u>5.176</u> X 30.08 X | | <u>552.0</u> | | | | | |
| | <u>5.260</u> X 30.15 X | | <u>537.9</u> | | | | | |
| 2.0 | <u>16.060</u> 8.935 7.125 | 78.0 | <u>981.932</u> 974.687 7.245 | 101.0 | 88.0 | 94.5 | 10 | 1.0087 |
| | <u>7.125</u> X 30.08 X | | <u>554.5</u> | | | | | |
| | <u>7.245</u> X 30.23 X | | <u>538.0</u> | | | | | |
| 4.0 | <u>26.000</u> 16.060 9.940 | 77.8 | <u>992.066</u> 981.932 10.134 | 105.0 | 88.0 | 96.5 | 10 | 1.0051 |
| | <u>9.940</u> X 30.08 X | | <u>556.5</u> | | | | | |
| | <u>10.134</u> X 30.37 X | | <u>537.8</u> | | | | | |
| 6.0 | <u>38.149</u> 26.000 12.149 | 77.1 | <u>1004.553</u> 992.066 12.487 | 108.0 | 91.0 | 99.5 | 10 | .9989 |
| | <u>12.149</u> X 30.08 X | | <u>559.5</u> | | | | | |
| | <u>12.487</u> X 30.52 X | | <u>537.1</u> | | | | | |
| 8.0 | <u>52.099</u> 38.149 13.950 | 77.0 | <u>1018.887</u> 1004.553 14.334 | 109.0 | 92.0 | 100.5 | 10 | .9963 |
| | <u>13.950</u> X 30.08 X | | <u>560.5</u> | | | | | |
| | <u>14.334</u> X 30.67 X | | <u>537.0</u> | | | | | |

Avg 1.0049

D.E.R.

OCT 31 1979

SOUTHWEST DISTRICT
TAMPA

RECEIVED

NOV 10 1975

DER
CENTRAL SUB DISTRICT
WINTER HAVEN

File

| | | | |
|-------------|-----|-----|-----|
| SDM | PER | PIP | MTG |
| A A | ENF | LAB | SB |
| A & G | TA | FIL | ALL |
| Action (A): | | | |
| Tessitore | | | |
| File: Souer | | | |

TO: General Counsel
THRU: Mr. Dan Farley
FROM: Hamilton S. Owen, Jr. HSO
DATE: November 6, 1975
SUBJECT: Lakeland Utilities Variance Request

city of Lakeland

On June 30, 1975, a request for a variance from the particulate emission standard for existing fossil fuel steam generators was received from the City of Lakeland. On July 9, I transmitted the attached memo containing my evaluation of the variance request. It is suggested that the City of Lakeland be notified, as expeditiously as possible, of the position of this Department relative to their variance request. The resolution of this matter will have a bearing on certification of Unit No. 3 at Lakeland Power Plant No. 3.

HSOJr/ce
Attachment

cc: Mr. Warren Strahm ✓
Mr. John Redmond

Fallen



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING
TALLAHASSEE, FLORIDA 32301

JOSEPH W. LANDERS, JR.

SECRETARY

MEMORANDUM

TO: Mr. John A. Redmond
THRU: *[Signature]* Don Farley
FROM: Hamilton S. Oven, Jr. *HSO*
DATE: July 9, 1975
SUBJECT: Variance Request - City of Lakeland

The following is a list of my initial thoughts on the Lakeland Utilities variance request:

1. I feel the letter is not in the form of the prescribed petition as required by 17-1.
2. An economic hardship variance per 403.201(1)(b), F.S. requires a timetable of compliance measures.
3. The letter does not indicate whether or not they have exhausted all other emission reduction alternatives such as burner modification, fuel - air ratio adjustments, or lower ash fuels.
4. The Air Quality Display Model referenced on page 2 of the letter may refer to the model submitted as part of their site certification application for Unit 3 at Power Plant No. 3. That model predicted values of 50 ug/m³ compared to a standard of 60. It is not clear from the model what particulate emission rate was used. Depending on the emission rate used, the predicted results could show violations.
5. The variance request does not show the requested emission rates.

BEST AVAILABLE COPY

Mr. John A. Redmond

July 9, 1975

Page two

6. Since we have had and possibly will have violations of the ambient air quality standards in the area from fugitive dust from phosphate mining and other sources and since the petition is deficient, I would recommend that the petition be summarily denied.
7. The purpose of the petition is, at least partially, to allow the burning of higher sulfur oil.

HSQJr/ce

cc: John Lottcher

Terry Cole

W. L. Linne

Frank Cross



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

June 25, 1975

Mr. Peter Baljet
Director
Fla. Dept. of Pollution Control
2562 Executive Center Circle, East
Montgomery Building
Tallahassee,
Fla. 32301

JUN 25 1975

EXECUTIVE CENTER

Dear Mr. Baljet:

The City of Lakeland, Department of Electric and Water Utilities, does hereby request a variance from the particulate emission standard for existing fossil fuel steam generators as stated in Chapter 17-2.04 (6) (e) 1.a and 2.a (FAC) for Units 4, 5, 6 and 7 at the Larsen Memorial Power Plant and Unit 1 at Power Plant No. 3.

This request is made under Chapter 17-1.23 (3) (6) 3 (FAC) as a special hardship. To date, the only proven method of removing particulate matter from oil fired power plants is with "hot side" electrostatic precipitators, bag house filters or flue gas scrubbing units. Each of these methods requires an area equal to that of the generating unit and major duct work modifications.

The Larsen Memorial Power Plant is a 9.34 acre site of which 95% is presently in use. With the remaining available land, there is not enough space to accomodate any particulate removal system.

The site at Power Plant No. 3, where Unit 1 is located, has a land area of 275 acres of which 40 acres is a lake. While this appears to be adequate to accomodate a particulate removal system, the site has an additional oil fired unit under construction and is scheduled to have two coal fired units built in the future. The first coal unit is currently pending certification from the Department of Pollution Control. All available space at this site will be needed for coal piles, coal transport systems, and various pollution control equipment and related disposal areas. Consequently, there is no land area available at this site to accomodate a particulate removal system.

A second problem with Unit 1 is that the duct arrangement would require that the location of the air pre-heaters would have to be changed before a "hot side" precipitator could be added. This would require a massive expenditure for this modification.

RECEIVED

JUN 25 1975




The City of Lakeland requests that the particulate emission standard for Larsen Units 4, 5, 6 and 7 and Unit 1 at Power Plant No. 3, be 0.2 lbs/M BTU heat input for the maximum time allotted by a variance. During this period, our Department will keep current of new technologies that prove to control particulate emissions from oil fired units which do not require large land areas or massive retrofit expenses.

Environmental Science and Engineering, Inc. conducted an Air Quality Display Model with the Larsen Units and Unit 1 burning 2.5% sulfur oil and Unit 3 at Power Plant No. 3 burning coal. The results of this model showed that the annual geometric mean of 60 micrograms per cubic meter would not be violated.

We hope you accept this variance request and will look forward to hearing from you.

Sincerely,


C. D. McIntosh, Jr.
Director ESW Utilities

/lp

RECEIVED

NOV 10 1975

D.E.R.
CENTRAL SUB DISTRICT
WINTER HAVEN

| | | | |
|--------------------|-----|-----|-----|
| SDM | PER | FTP | MTG |
| A A | ENF | LAB | BB |
| A & G | TA | FEL | ALL |
| Action (A): | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| File: <i>Sover</i> | | | |

11/12/75

TO: General Counsel

THRU: Mr. Dan Farley

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DATE: November 6, 1975

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HSOJr/ce
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Farley



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING
TALLAHASSEE, FLORIDA 32301

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Mr. John A. Redmond
July 9, 1975
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Terry Cole
W. L. Linne
Frank Cross



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

June 25, 1975

RECEIVED

Mr. Peter Baljet

Director

Fla. Dept. of Pollution Control
2562 Executive Center Circle, East
Montgomery Building
Tallahassee,
Fla. 32301

JUN 26 1975

EXECUTIVE DIRECTOR

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RECEIVED

JUN 30 1975

DIV. OF PLANNING

ALL-AMERICA CITY 1970




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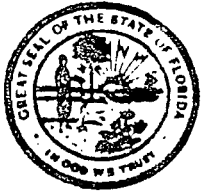
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Sincerely,


C. D. McIntosh, Jr.
Director ESW Utilities

/lp



REUBEN O'D. ASKEW
GOVERNOR

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CENTRAL SUBDISTRICT
P.O. BOX 9205
500 E. CENTRAL AVENUE
WINTER HAVEN, FLORIDA 33880

JOSEPH W. LANDERS JR.
SECRETARY

SEPTEMBER 30, 1975
CITY OF LAKELAND
POLK COUNTY AP

C. D. McIntosh, Jr.
Director, E. & W Utilities
City of Lakeland
Lakeland, Florida 33802

RE: Extension of Construction Permit
AC 53-2244

Dear Sir:

We are in receipt of your request for an extension of the construction permit for the above project.

The provisos are changed as follows:

Proviso #1 from Feb. 28, 1975 to Dec. 1, 1975
Proviso #5 from June 1, 1975 to May 1, 1976

At least sixty (60) days before the expiration date, you must make an application for "Permit to Operate".

Very truly yours,

J. H. Kerns, P.E.
Chief of Permitting

file

JHK/DAT/pm

cc: Central Files



JOSEPH W. LANDERS JR

SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

POST OFFICE BOX 9205
500 EAST CENTRAL AVENUE
WINTER HAVEN, FLORIDA 33880

September 3, 1975
CITY OF LAKELAND
POLK COUNTY AP

C. D. McIntosh, Jr.
Director, E & W Utilities
City of Lakeland
Lakeland, Florida 33802

RE: Extension Request for
Air Permit AC53-2244

Dear Sir:

The items indicated below were not in the permit application submitted by you recently.

- ☒ Application fee \$20.00
- ☐ Professional engineer's signature and seal
- ☐ Company officer's signature
- ☐ Certificate of Good Standing
- ☐ UTM coordinates
- ☐ Plot plan
- ☐ Flow diagram
- ☐ Stack data (height, diameter, temperature, etc.)
- ☐ Emission data (pages 3 and 4)
- ☐ Statement that facility complies with local government rules and regulations
- ☐ Air quality impact study

Review of the application will not begin until the above information is received. If you have any questions, please call.

JLT/pm



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

August 22, 1975

RECEIVED

AUG 26 1975

Mr. Dan Williams
Fl. Dept. of Environmental Regulation
Central Subdistrict
500 East Central Ave.
Winter Haven, Fl. 33880

D. E. R.
CENTRAL SUB DISTRICT
WINTER HAVEN

Re: Construction Permits Nos. IC53-2035 and AC53-2244 for Unit No. 2 at Power Plant No. 3

Dear Mr. Williams:

As you are aware, due to the delays we have encountered in the construction of Unit No. 2 at Power Plant No. 3, the construction permits for this unit have passed their expiration dates. Permit No. IC53-2035 expired on 8-1-75 and Permit No. AC53-2244 expired on 6-1-75. The start-up date for this unit has now been re-scheduled for sometime between October 10 and November 15, 1975. We hereby request that both construction permits be extended to 5-1-76 effective from the date of expiration of the individual permit. This time frame will allow the unit to become operational and allow time for the testing required for an operating permit, for which an application must be submitted 30 days prior to the expiration date of the construction permits. 60?

Additionally, proviso #17 of Permit No. IC53-2035 states that the chemical wastes from this unit "be neutralized to a pH of 6.5 to 8.5, settled and retained in a holding pond with no discharge or overflow to Lake Parker." We request that a modification of this proviso be granted to allow the construction of a spray evaporation pond instead of the holding pond.

Chapter 17-4.08 (FAC) states that "for good cause", modifications may be required to conform to new or additional conditions of a permit. With your approval of this modification, not only will the chemical wastes from Unit No. 2 be eliminated, but also those from Unit #1 at Power Plant No. 3 and Units Nos. 4, 5, 6 and 7 from the Larsen Power Plant. We believe that the elimination of those additional chemical wastes meet the good cause requirements in 17-4.08.

If optimum equipment delivery dates are met, we expect the spray pond to be completed by the end of February, 1976. Since this date is past the scheduled start-up date of Unit No. 2, we request that the start-up be allowed to continue while the construction of the spray pond is under way. Chapter 17-4.08 (1) allows the permittee of a modification reasonable time to conform to the new or additional conditions and we feel this request falls under these conditions.

ALL-AMERICA CITY 1970



During this interim period, the chemical wastes from this unit will go to a baffled retention basin which is already constructed. The wastes will be treated with lime, neutralized to a pH of 6.5 - 8.5 and discharged into the cooling water effluent canal from Unit No. 1. We wish to reemphasize that this method of waste elimination is only temporary and will be discontinued once the spray pond is completed.

In order to meet Federal requirements, we submitted a NPDES permit application for this unit to the EPA Region IV on June 10, 1975. We contacted Region IV and explained our decision to apply for a permit modification from your office and that the spray pond would not be completed by unit start-up. We were informed that they would require us to submit a short form application in the event that our permit was acted upon before the spray pond was completed. In this case, they would issue a permit based on the short form application and once the spray pond was completed, would issue another permit reflecting the elimination of the wastes.

We hope that you will give this matter your urgent attention and grant our request for the construction permit extensions and the permit modification. We are enclosing the design data for the spray pond for your review.

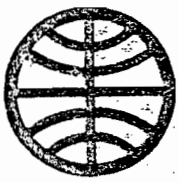
If I can be of any other assistance, please contact my office.

Sincerely,

C D McIntosh Jr

C. D. McIntosh, Jr.
Director
Electric & Water Utilities

/lp
Enc.



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

Sept. 9, 1975

RECEIVED

SEP 10 1975

D. E. R.
CENTRAL SUB DISTRICT
WINTER HAVEN

Mr. Dan William
Fl. Department of Environmental Regulation
P. O. Box 9205
Winter Haven, Fl. 33880

Dear Mr. Williams:

Enclosed is a check for \$40.00 required for application to extend construction permits Nos. IC53-2035 and AC53-2244.

Enclosed also is an additional copy of the spray pond data that was previously sent to your office.

Sincerely,

C. D. McIntosh p WRA

C. D. McIntosh, Jr.
Director
Electric & Water Utilities

Permit # 1 - 2-28-75

~~Feb 1 75~~

~~6-1-75~~

Permit # 5 - 6-1-75

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 673

RECEIPT FOR APPLICATION TO OPERATE/CONSTRUCT POLLUTION SOURCES

Received from City of Lakeland Date 9-10-75
Address Lakeland, Florida 33802 Dollars \$ 40.00
Source Extension permits IC53-2035 and AC53-2244
Applicant Name & Title C. D. McIntosh, Jr., Director Electric & Water Utilities
Applicant Address Lakeland, Florida 33802
Central Subdistrict WH
By *Sub Eddy*



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING
TALLAHASSEE, FLORIDA 32301

JOSEPH W. LANDERS, JR.

SECRETARY

D. P. C.

JUL 11 1975

WEST CENTRAL REGION
ST. PETERSBURG

M E M O R A N D U M

TO: Mr. John A. Redmond
THRU: Dan Farley
FROM: Hamilton S. Oven, Jr. HSO
DATE: July 9, 1975
SUBJECT: Variance Request - City of Lakeland

W 7/11/75

The following is a list of my initial thoughts on the Lakeland Utilities variance request:

1. I feel the letter is not in the form of the prescribed petition as required by 17-1.
2. An economic hardship variance per 403.201(1)(b), F.S. requires a timetable of compliance measures.
3. The letter does not indicate whether or not they have exhausted all other emission reduction alternatives such as burner modification, fuel - air ratio adjustments, or lower ash fuels.
4. The Air Quality Display Model referenced on page 2 of the letter may refer to the model submitted as part of their site certification application for Unit 3 at Power Plant No. 3. That model predicted values of 50 ug/m³ compared to a standard of 60. It is not clear from the model what particulate emission rate was used. Depending on the emission rate used, the predicted results could show violations.
5. The variance request does not show the requested emission rates.

Mr. John A. Redmond
July 9, 1975
Page two

6. Since we have had and possibly will have violations of the ambient air quality standards in the area from fugitive dust from phosphate mining and other sources and since the petition is deficient, I would recommend that the petition be summarily denied.
7. The purpose of the petition is, at least partially, to allow the burning of higher sulfur oil.

HSOJr/ce

cc: John Bottcher
Terry Cole
W. E. Linne ✓
Frank Cross



JOSEPH W. LANDERS JR.
SECRETARY


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

POST OFFICE BOX 9205
500 EAST CENTRAL AVENUE
WINTER HAVEN, FLORIDA 33880

August 6, 1975

M E M O R A N D U M

TO: File

FROM: Otis Smith 

SUBJECT: Lakeland Power (Larson) Plant
Oil Spill - Lake Parker

On the night of August 2, 1975 a quantity of oil was spilled at the Lakeland Power Plant (Larson) and into Lake Parker. They contacted city maintenance and Clean Rivers, Inc. to work on the clean-up project. On August 4, 1975, Tony Pearce, Paul Myers, and Otis Smith met Mr. Dave Reese of Game and Fish at Lake Parker. Clean up was in the finishing stages. There was no evidence of a fish kill and the oil had been almost totally contained. We requested a complete report from Mr. Libby. No action is anticipated because of fast efficient clean up operations which kept damages to a minimum.

OS/cjm



JOSEPH W. LANDERS JR.

SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

POST OFFICE BOX 9205
500 EAST CENTRAL AVENUE
WINTER HAVEN, FLORIDA 33880

July 7, 1975

M E M O R A N D U M

TO: John Bottcher
FROM: J. H. Kerns *JK*
SUBJECT: Variance for Lakeland Utilities
Polk County - AP

Please find attached a copy of Lakeland Utilities request for a variance. If we can be of any service, let us know.

JHK/cjm
Attachment

cc: W. E. Linne/with attachment

File



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

June 25, 1975

S.L.T. FILE

D.P.C.

JUL 2 1975

WEST CENTRAL REGION
WINTER HAVEN

Mr. Peter Baljet
Director
Fla. Dept. of Pollution Control
2562 Executive Center Circle, East
Montgomery Building
Tallahassee,
Fla. 32301

Dear Mr. Baljet:

The City of Lakeland, Department of Electric and Water Utilities, does hereby request a variance from the particulate emission standard for existing fossil fuel steam generators as stated in Chapter 17-2.04 (6) (e) 1.a and 2.a (FAC) for Units 4, 5, 6 and 7 at the Larsen Memorial Power Plant and Unit 1 at Power Plant No.3.

This request is made under Chapter 17-1.23 (3) (6) 3 (FAC) as a special hardship. To date, the only proven method of removing particulate matter from oil fired power plants is with "hot side" electrostatic precipitators, bag house filters or flue gas scrubbing units. Each of these methods requires an area equal to that of the generating unit and major duct work modifications.

The Larsen Memorial Power Plant is a 9.34 acre site of which 95% is presently in use. With the remaining available land, there is not enough space to accomodate any particulate removal system.

The site at Power Plant No. 3, where Unit 1 is located, has a land area of 275 acres of which 40 acres is a lake. While this appears to be adequate to accomodate a particulate removal system, the site has an additional oil fired unit under construction and is scheduled to have two coal fired units built in the future. The first coal unit is currently pending certification from the Department of Pollution Control. All available space at this site will be needed for coal piles, coal transport systems, and various pollution control equipment and related disposal areas. Consequently, there is no land area available at this site to accomodate a particulate removal system.

A second problem with Unit 1 is that the duct arrangement would require that the location of the air pre-heaters would have to be changed before a "hot side" precipitator could be added. This would require a massive expenditure for this modification.




The City of Lakeland requests that the particulate emission standard for Larsen Units 4, 5, 6 and 7 and Unit 1 at Power Plant No. 3, be 0.2 lbs/M BTU heat input for the maximum time allotted by a variance. During this period, our Department will keep current of new technologies that prove to control particulate emissions from oil fired units which do not require large land areas or massive retrofit expenses.

Environmental Science and Engineering, Inc. conducted an Air Quality Display Model with the Larsen Units and Unit 1 burning 2.5% sulfur oil and Unit 3 at Power Plant No. 3 burning coal. The results of this model showed that the annual geometric mean of 60 micrograms per cubic meter would not be violated.

We hope you accept this variance request and will look forward to hearing from you.

Sincerely,


C. D. McIntosh, Jr.
Director E&W Utilities

/lp



City of Lakeland

WORLD CITRUS CENTER

LAKELAND, FLORIDA 33802

June 25, 1975

J. L. T.
File D. P. C.

JUL 2 1975

WEST CENTRAL REGION
WINTER HAVEN

Mr. Peter Baljet
Director
Fla. Dept. of Pollution Control
2562 Executive Center Circle, East
Montgomery Building
Tallahassee,
Fla. 32301

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We hope you accept this variance request and will look forward to hearing from you.

Sincerely,


C. D. McIntosh, Jr.
Director E&W Utilities

/lp



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING
TALLAHASSEE, FLORIDA 32301

PETER P. BALJET
EXECUTIVE DIRECTOR

May 28, 1975

W.D. FREDERICK, JR.
CHAIRMAN

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

| | | |
|---|--|---|
| SENT TO <i>Mr. C. D. McIntosh, Jr.</i> | | POSTMARK OR DATE <i>6-12-75</i> |
| STREET AND NO. <i>P.O. Box 368</i> | | |
| P.O., STATE AND ZIP CODE <i>Lakeland, Fla. 33802</i> | | |
| OPTIONAL SERVICES FOR ADDITIONAL FEES | | |
| RETURN RECEIPT SERVICES | 1. Shows to whom and date delivered With delivery to addressee only | 15¢ 65¢ |
| | 2. Shows to whom, date and where delivered .. With delivery to addressee only | 35¢ 85¢ |
| DELIVER TO ADDRESSEE ONLY | | 50¢ |
| SPECIAL DELIVERY (extra fee required) | | |

Mr. C. D. McIntosh, Jr.
Director
Department of E. and W Utilities
P.O. Box 368
Lakeland, Florida 33802

No. 656462

Dear Sir:

PS Form 3800
Apr. 1971

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See other side)
* GPO : 1973 O - 460-743

The sulfur dioxide rule for existing fossil fuel steam generators, Chapter 17-2.04(6)(e)2 was amended by the Florida Department of Pollution Control Board on May 20, 1975. A copy of the rule is attached for your convenience, Section 17-2.04(6)(e)2.f requires monitoring of sulfur dioxide emissions and the effects of emissions on ambient concentrations.

All affected sources must submit on or before July 1, 1975, a monitoring program for both the emissions and their effects. For the purposes of this requirement the Department will use the following definitions:

"Emission monitoring" means a continuous source sampler on each source or an alternative method for determining sulfur dioxide emissions which can be validated by source sampling.

The "effect of the emissions on ambient concentrations of sulfur dioxide" means an ambient air sampling system which determines concentrations of sulfur dioxide, sulfates, particulates and metallic ions.

Meteorological conditions are to be determined and reported as a requirement for an approvable monitoring program.

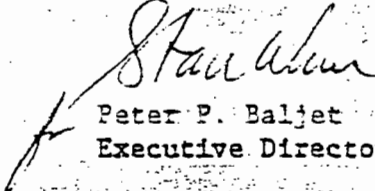
The written proposal required by subsection f shall be submitted to any affected local program and the appropriate regional office at the same

Page 2
May 28, 1975

time. Following review by both, the region will forward the proposal to the Division of Planning in Tallahassee for final approval to insure uniform application of the requirements.

Your attention to this matter will be appreciated.

Sincerely,



Peter P. Baljet
Executive Director

PPB/sjr



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

POST OFFICE BOX 9205
500 EAST CENTRAL AVENUE
WINTER HAVEN, FLORIDA 33880

PETER F. BALJET
EXECUTIVE DIRECTOR

W.D. FREDERICK, JR.
CHAIRMAN

May 28, 1975

W. R. Lesnett
City of Lakeland Plt. #3
P. O. Box 368
Lakeland, Florida 33801

Dear Mr. Lesnett:

In a review of permits by this office it was noted that
permit number AO 53-2249 will expire on 7/1/75.

Your attention is called to Chapter 17-4.09 FAC Renewals
which require the permittee to apply for renewal of a
permit (60) sixty days prior to the expiration of any
Department permit.

Separate applications must be submitted for each point
source.

If the permit is no longer applicable, please inform this
office.

Your cooperation in this matter is appreciated.

Yours truly,

J. Tessitore
J. Tessitore
Air Permitting Engineer
West Central Region

JT/pm



PETER P. BALLET
EXECUTIVE DIRECTOR

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL
POST OFFICE BOX 9205
500 E. CENTRAL AVENUE
WINTER HAVEN, FLORIDA 33881

DAVID H. LEVIN
CHAIRMAN

MARCH 6, 1974
CITY OF LAKELAND
POLK COUNTY AP

Mr. C. B. McIntosh, Jr., Director
Dept. of Electric and Water Utilities
City of Lakeland
P.O. Box 368
Lakeland, Florida

Dear Mr. McIntosh,

Pursuant to 32A C.F.R. Chapter XIII, Federal Energy Policy Regulation 2, switching from a higher sulfur petroleum product to a lower sulfur petroleum product is prohibited during the effective period of the regulation. As a result, this regulation has a great impact on the compliance schedule established by the Department for your facilities.

In order to accommodate this regulation, yet insure that Sections 17-2.04 (6) (e) 2.c. and d. and 3.b. F.A.C. are met, a categorical compliance schedule change was adopted on January 22, 1974. This regulation states:

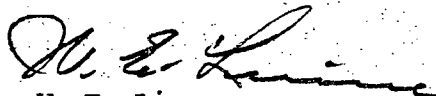
4. All existing fossil fuel steam generators which on the effective date of this paragraph (17-2.04 (6) (e)) are not in compliance with above sulfur dioxide emission limiting standards and for which a compliance schedule has been established pursuant to 40 Code of Federal Regulations 51.15, and such schedule is based on use of low sulfur fuel, shall submit to the Department on or before May 1, 1974 one of the following:
 - a. A verified certification showing that the source presently complies with and will continue to comply with the sulfur oxide emission standards set forth in paragraphs 17-2.04 (6) (e) 1, 2, and 3, Florida Administrative Code. The certification shall include test data and results and any other information necessary for the Department to determine compliance.
 - b. A binding contract or other documentation showing that the source will convert to the use of low sulfur fuel and that the low sulfur fuel will be available for continuous use on or before July 1, 1975, plus a good and sufficient bond shall be posted in an amount determined by the Department. Said bond to be forfeited if the low sulfur fuel is not available.

- c. A control plan and schedule by which the source will expeditiously come into compliance by July 1, 1975 with the sulfur dioxide emission limiting standard by some method other than by the purchase and use of low sulfur fuel.

You are hereby placed on Notice that the Department will enforce this compliance schedule change under Florida Statute 403.161.

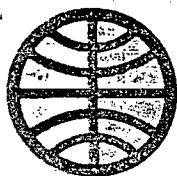
The Department recognizes the possible technical, legal and administrative problems that may occur involving the regulations of the E.P.A., E.P.O. and the D.P.C. Consequently, if difficulties arise, please advise this office so that a meeting can be established to formulate a position direction.

Very truly yours,



W. E. Linne
Regional Administrator
West Central Region

WEL/pm



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

D. P. C.

FRED W. ...
DAVID F. ...

DEC 13 1973

DEPARTMENT OF ELECTRIC AND WATER UTILITIES
OPERATIONS CENTER • TELEPHONE 813-682-1121

WEST CENTRAL REGION
P.O. BOX 368
1000 EAST PARKER STREET

C. D. McINTOSH, JR.
DIRECTOR

December 14, 1973

Department of Pollution Control
West Central Region
P. O. Box 944
Winter Haven, Florida 33880

Attention: Mr. W. E. Linne
Regional Engineer

Gentlemen:

Subject: City of Lakeland
Air Implementation Plan
Permit Nos. A053-2249, A053-576, A053-577
A053-579, A053-580

The City of Lakeland does hereby request a variance in the air implementation schedule set up as part of our compliance schedule adopted May 16, 1973.

Our schedule had the following dates:

- Item 1 - 7/2/73 - Latest date to submit final control plan.
- Item 2 - 12/24/73 - Latest date by which contract will be awarded.
- Item 3 - 10/18/74 - Latest date of initiation of construction.
- Item 4 - 4/4/75 - Latest date of construction completion.
- Item 5 - 6/1/75 - Latest date source complies with rules.

Item 1 was complied with by our letter of June 19, 1973 in which we stated our intentions of awarding low sulfur oil contracts by December 24, 1973.

We now request a variance in this schedule which will allow us to hold Items 2 and 3 in abeyance until the world wide energy crisis is eased to the point where we can obtain low sulfur oil.



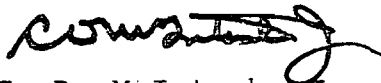
Mr. W. E. Linne
December 14, 1973
Page Two

For back up information the following is enclosed:

- a) Invitation to bid dated November 23, 1973.
- b) Specifications for low sulfur oil dated November 23, 1973.
- c) Addendum No. 1 to these specifications dated November 26, 1973.
- d) No bid letter from Belcher Oil Company dated December 4, 1973.
- e) No bid letter from Central Oil Company dated November 28, 1973.
- f) No bid letter from Western Fuel, Inc. dated December 4, 1973.
- g) Unacceptable bid for 2% sulfur oil from Fleetwing Corporation dated December 12, 1973.

Your prompt attention to this request will be appreciated.

Very truly yours,



C. D. McIntosh, Jr., Director
Department of Electric & Water Utilities

CDM:lw

Enclosures

Mr McSh...

INVITATION TO BID

NOVEMBER 23, 1973

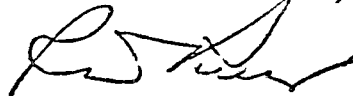
Sealed bids will be accepted by the Purchasing Agent, City of Lakeland, Florida until 10:00 AM on Thursday, December 13, 1973, at which time all bids received shall be publicly opened in the office of the Purchasing Agent, 1140 East Parker Street, Lakeland, Florida and read aloud on the following requirement:

The City of Lakeland's requirements for Bunker "C" (No. 6) Fuel Oil for its municipal power plants for the twelve (12) months period beginning on or about February 15, 1974, in accordance with the attached specifications dated November 23, 1973.

All bids must be submitted in triplicate and must be enclosed within a sealed envelope with the words "SEALED BID - BUNKER "C" FUEL OIL" and the bidder's name clearly marked on the outside thereof.

The City of Lakeland reserves the right to waive irregularities or technicalities in any bid, to reject any or all bids and/or to accept the bid which, in its judgement, is in the best interest of the City.

CITY OF LAKELAND, FLORIDA



R. D. Perez
Purchasing Agent

Specifications for Low Sulfur Fuel Oils
for the
Municipal Power Plants
of the
City of Lakeland, Florida
November 23, 1973

1. General

This specification covers the furnishing and delivery of low sulfur Bunker "C" (No. 6) fuel oils to the municipal power plants of the City of Lakeland, Florida.

2. Period of Contract

The period of the contract shall be from October 16, ¹⁹⁷⁴~~1973~~ through October 15, ¹⁹⁷⁴~~1973~~ with the option of the City of Lakeland to renew for an additional twelve (12) months.

3. Quantity

It is estimated that the oil requirements under this contract for the twelve months period of the contract will be approximately one million, four hundred thousand (1,400,000) barrels divided up in sulfur contents as follows:

| | |
|--|----------------|
| one percent (1%) sulfur max | 800,000 bbls |
| point seventy seven percent (0.77%) sulfur max | 600,000 bbls |
| Total | 1,400,000 bbls |

4. Qualities

Fuel oils quoted must conform to the "Commercial Standard Specifications for Fuel Oils" (CS 12-48) of the U.S. Department of Commerce and ASTM specifications D396-69 (Grade No. 6). The present ASTM specifications covers a broad field of quality in present day Bunker "C" Fuel Oils. The City specifically adds the following limiting factors to the above specifications.

- a) The bidder must state the guaranteed heating value of both the 1% max sulfur oil and the 0.77% max sulfur oil in Btu's per gallon. If fuel is delivered having a heating value less than the guaranteed value, the price shall be adjusted as stipulated in Section 7 - Pricing.
- B) The maximum sulfur contents are one percent (1%) and point seventy seven percent (0.77%) by weight.
- c) The guaranteed amount of water by distillation and sediment by extraction shall not exceed one quarter of one percent (0.25%). If oil is delivered having water and sediment in excess of one quarter of one percent (0.25%), the pricing shall be adjusted as stipulated in Section 7 - Pricing.
- d) The bidder shall state the parts per million of vanadium that can be expected in the fuel oils bid. Maximum and acceptable limits shall be 125 parts per million.
- e) Low pour oil is desired. Bidder shall state the maximum pour point that can be expected in each of the fuels bid.

11-26-73 read through
 to change this to 1974

5. Analysis

A complete recent typical analysis of each of the fuel oils offered must be enclosed with the bid. As these are to be fuels used in the City's steam generators, these analyses will be used in the final evaluation of the bids in an effort to obtain the most acceptable fuels for this type of operation. The bidder shall state the origin of the fuels, that is domestic, Venezuelan, etc.

6. Deliveries

Deliveries shall be made to the Larsen Memorial Power Plant, Power Plant No. 3, or to any other City of Lakeland owned power plant located in the greater Lakeland area.

Fuel oil deliveries to these plants shall be by standard tank trucks of approximately 6,000 gallons each. Deliveries and pricing shall be F.O.B. the oil storage tanks of the plants. Deliveries shall be made as requested by the City of Lakeland and may vary in quantities with load variations on the plants.

7. Pricing

The City requests firm bids for the quantities and sulfur contents specified. Alternate methods of bidding may be submitted if such alternates use as a base, one of the applicable postings in Platt's Oilgram and if the bidder clearly states the method used in arriving at the alternate price. In evaluating such alternate prices, the previous twelve months history of the alternate base as quoted in Platt's Oilgram shall be used to determine stability and suitability of the base. If bids are made on the alternate method, delivered price F.O.B. the City's tanks shall be submitted.

a) Water and Sediment Adjustment

In event that the water and sediment content of the oil exceeds the guaranteed amount of one quarter of one percent (0.25%), a price adjustment shall be made, on a volumetric basis, based on the equivalent barrels of fuel oil equal to the volume of water and sediment delivered in excess of 0.25%. This price adjustment shall be deducted from the price of oil as invoiced.

b) Heating Value Adjustment

Bidder shall state the heating values in Btu per gallon for each oil bid. In the event the heating value of the oil tests less than this stated value, the volume of water and sediment shall be deducted and the heating value calculated based on 0.25% water and sediment. If this calculated value is still less than the stated values, the price of the oil will be calculated on a cost per million Btu basis using the heating value as corrected to 0.25% water and sediment. This price adjustment is to be deducted from the price of oil as invoiced.

c) Temperature adjustment

Correction for temperatures above or below 60 degrees F. shall be made in accordance with the Standard Abridged Volume Correction Tables for Petroleum Oil, ASTM Designation D-1250-56. IP Designation 200/52.

8. Testing

The buyer will draw one sample of oil from a delivery each week or as required; this sample will be tested in the City's laboratory. Should questions arise, the sample will be sent to the Pittsburgh Testing Laboratory or any other certified laboratory for analysis. The average weekly analysis in a given month will be used for calculating the price adjustment during that month.

9. Equipment

The bidder shall show in his bid that he has ample storage facilities and equipment to load and transport the fuel as specified.

10. Acceptance of Bids

The City reserves the right to accept or reject any and all bids, to waive irregularities in any bid submitted, and to readvertise.

11. Failure to Perform

In the event the contractor shall fail to provide the amount of fuel required and requested to be delivered to the City of Lakeland, the contractor shall pay to the City of Lakeland, as liquidated damages, the additional amount required to be expended by the City of Lakeland to provide gas or fuel oil requirements for the City's electrical generating facilities.

12. Termination

Should any regulatory body impose restrictions that would prohibit the City of Lakeland from burning the specified fuel, then this contract may be terminated unless the supplier should elect to meet the requirements set by the regulatory body.

Anticipated delivery schedule for contract period of October 16, 1974 through October 15, 1975.

| | Est No. of barrels required | | Total |
|-----------------|-----------------------------|----------|-----------|
| | 1% oil | .77% oil | |
| Oct 15-31, 1974 | 5,000 | 20,000 | 25,000 |
| Nov | 5,000 | 43,000 | 48,000 |
| Dec | 5,000 | 43,000 | 48,000 |
| Jan 1975 | 5,000 | 43,000 | 48,000 |
| Feb 1975 | 66,000 | 43,000 | 109,000 |
| Mar 1975 | 112,000 | - | 112,000 |
| Apr 1975 | 64,000 | 43,000 | 107,000 |
| May 1975 | 80,000 | 54,000 | 134,000 |
| June 1975 | 99,000 | 66,000 | 165,000 |
| July 1975 | 100,000 | 79,000 | 179,000 |
| Aug 1975 | 106,000 | 71,000 | 177,000 |
| Sept 1975 | 107,000 | 71,000 | 178,000 |
| Oct 1-15, 1975 | 40,000 | 27,000 | 67,000 |
| | 794,000 | 603,000 | 1,397,000 |

ADDENDUM NO. 1
TO
SPECIFICATIONS FOR LOW SULFUR FUEL OILS
FOR THE
MUNICIPAL POWER PLANTS
OF THE
CITY OF LAKE LAND, FLORIDA
NOVEMBER 23, 1973
AND
INVITATION TO BID
NOVEMBER 23, 1973

Change period of contract as shown in specifications to read October 16, 1974 through October 15, 1975.

Change period of usage as shown in Invitation to Bid as beginning on or about October 16, 1974.

November 26, 1973

BELCHER OIL COMPANY



P.O. BOX 1731
MIAMI, FLORIDA 33101

December 4, 1973

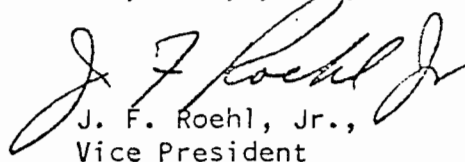
Mr. R. D. Perez
Purchasing Agent
City of Lakeland
Lakeland, Florida

Dear Mr. Perez:

We regret to advise that we are unable to respond to your bid request for the supply of low sulfur No. 6 fuel oil during the period October 16, 1974, through October 15, 1975. We have contacted our suppliers and find that due to the current energy crisis, coupled with the uncertainty of future supplies of all fuel oil products, we simply cannot provide the volumes of low sulfur residual to meet your estimated needs.

Further complicating the supply picture is the new proposal calling for the allocation of residual fuels which is to be activated later this month. At this point in time, we do not know how this will effect future supplies to the cities municipal power generating plants, but will of course keep you advised.

Very truly yours,


J. F. Roehl, Jr.,
Vice President

JFR, Jr.:sbl

RECEIVED
CITY OF LAKELAND
DECEMBER 11 1973

U.S. DEPT. OF COMMERCE
EAST WASHINGTON, D.C.
20540

central company, inc.

PETROLEUM PRODUCTS

Phone Area 408 444 1111
Post Office Box 1111
Tampa, Florida 33601

November 28, 1973

Purchasing Agent
Mr. R. D. Perez
City of Lakeland
1140 E. Parker Street
Lakeland, Florida

Dear Mr. Perez:

We would like to take this opportunity to thank you for your invitation to bid on your diesel requirements. However, at this time, we are not in a position to submit a bid.

We would like to remain on your mailing list for future bids.

Sincerely,

CENTRAL COMPANY, INC.

[Handwritten signature]
R. D. Perez
Purchasing Agent
City of Lakeland

PJB/dw

Best Available Copy

WESTERN FUEL, INC.

5635 E. COWHATTAN AVENUE

P.O. BOX 11705

Tampa, Florida 33610

December 4, 1973

PHONE (813) 626-4197

OFFICES
JACKSONVILLE
TAMPA

Purchasing Agent
City of Lakeland
1140 East Parker Street
Lakeland, Florida

Gentlemen:

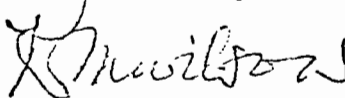
This is to thank you for the opportunity given to submit an offer of certain requirements #6 Bunker "C" Fuel Oil.

In view of general industry conditions which are generally well known and including our firm, we are unable to submit an offer for any portion, however small of that requested.

Thanks again.

Sincerely,

WESTERN FUELS, INC.



R. M. Wilson
Sales Rep.

RMW:nb

RECEIVED
JAN 10 1974

U.S. GOVERNMENT PRINTING OFFICE: 1969 O - 344-100

QUOTATION FROM



P. O. BOX 22 • PHONE (813) 683-7557 • LAKELAND • FLORIDA • 33802

TO

Purchasing Agent
City of Lakeland
Lakeland, Florida

December 12, 1973

QUOTATION FOR PERIOD FROM _____ THROUGH _____

| <u>QUANTITY</u> | <u>PRODUCT</u> | <u>PRICE PER GALLON</u> | <u>F.O.B.</u> |
|-----------------|----------------|-------------------------|---------------|
|-----------------|----------------|-------------------------|---------------|

SEE ATTACHMENT

TERMS 1st - 15th, due 25th; 16th - end of month, due 10th

CREDIT LIMIT: Requirements

Signed acceptance, with return of one copy of this quotation within _____ days, shall constitute a contract with Fleetwing Corporation. Such contract shall be subject to the "terms and conditions" on the reverse side hereof.

ACCEPTED:

BY _____

DATE _____

FLEETWING CORPORATION

BY _____

The terms and conditions of the proposal are as follows:

1. The period of supply shall be from February 15, 1974 to October 16, 1975 continuing annually thereafter on a perpetual basis contingent upon the mutual consent of Fleetwing Corporation and the City of Lakeland.
2. The quantity shall be as available. It is estimated that a twelve (12) months supply will be one million, four hundred thousand (1,400,000) barrels.
3. The quality of the oil conforms to the Commercial Standard Specification for Fuel Oil of the U. S. Department of Commerce and ASTM Specifications D396-69 (Grade No. 6). Specific factors are as follows:
 - A. The sulfur content of the oil shall be two percent (2%) sulfur maximum until October 15, 1974. At that time the sulfur content of the oil will be seventy-seven hundredths percent (0.77%) maximum, if available.
 - B. A heating value of one hundred fifty thousand (150,000) B.T.U.'s per gallon.
 - C. Water by distillation and sediment by extraction not to exceed one quarter of one percent (0.25%).
 - D. Parts per million of vanadium not to exceed 125 parts per million.
4. Deliveries to be made by tank truck of approximately 6,000 gallons each.
5. Pricing shall be as follows:

| | | |
|---|---|--|
| Two percent (2%) maximum sulfur oil | - | \$5.84 per barrel |
| Seventy-seven hundredths percent (0.77%) maximum sulfur oil | - | Fleetwing's cost plus three percent (3%) plus truck freight |

The above prices are subject to escalate based upon Fleetwing's December 13, 1973, cost of Bunker "C" Fuel Oil FOB Tampa Bay area water terminal. Prices may be verified by an independent Certified Public Accountant chosen by the City of Lakeland.

6. It is understood that if Fleetwing or Fleetwing's suppliers are unable to meet demand for product or, in the event of failure or delay in delivery due to exhaustion, reduction or unavailability of product, or stock or component necessary in the manufacture or production of such product, regardless of the source from which deliveries are normally made, or the occurrence of any contingency whatsoever, including without limitation, failure of transportation, acts of God, labor difficulties, other recognized force majeure conditions and compliance with any governmental order, regulation, recommendation, request or allocation program (whether voluntary or involuntary), affecting directly or indirectly Seller's ability to perform hereunder or serve its customers, Seller shall have the right to curtail deliveries or allocate its supply of product for sale among all of its customers in any manner which, in its sole discretion, is fair and reasonable under the circumstances and Buyer shall not hold Seller responsible in any manner for any losses which Buyer may claim as a result of any such curtailment or allocation by Seller.



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

PETER P. BALJET
EXECUTIVE DIRECTOR

NOVEMBER 28, 1973
POLK CO. AP
CITY OF LAKELAND

DAVID H. LEVIN
CHAIRMAN

Mr. W. A. Smith
Fleetwing Corporation
P.O. Box 22
Lakeland, Florida 33802

Dear Mr. Smith,

Enclosed is a copy of the rules on air pollution for Florida. One section of the rules limits the emissions from fossil fuel steam generators. To comply with sulfur oxide emission limit, an existing oil fired boiler (without controls like those used to generate electric power by the City of Lakeland) will have to burn oil with 1% or less sulfur. A new plant would have to use oil with 0.77% or less sulfur.

Because of the fuel shortage facing this nation, the Florida Pollution Control Board has authorized a temporary relaxation of the air pollution rules. If you are to supply low sulfur fuel to your clients, then your client should apply for a variance from the Department's rules.

Yours very truly,

Thomas E. Hunnicutt
Professional Engineer
West Central Region

TEH/WMH/pm
Enclosure: Chapter 17-2

JOHN R. MIDDLEMAS
BOARD MEMBER

GEORGE RUPPEL
BOARD MEMBER

JAMES F. REDFORD, JR.
BOARD MEMBER

W.D. FREDERICK, JR.
BOARD MEMBER

JULY 12, 1973
POLK CO. AP
LAKELAND POWER PLANT

Mr. C. B. McIntosh, Jr., Director
Department of Water & Electric Utilities
P.O. Box 368
Lakeland, Florida

Dear Mr. McIntosh,

Chapter 17-2.04 (6)(e), FAC, sets emissions limit standards for nitrogen oxides and visible emissions from fossil fuel steam generators. The Department does not have evidence that you are in compliance with this rule. We will recommend the following compliance schedule at the August 9, 1973 public hearing for your plants:

- 1) Submit final control plan for compliance with NO_x and visible emissions by December 1, 1973.
- 2) Submit evidence of ~~contract~~ for the control of NO_x and visible emissions by May 3, 1973.
- 3) Start construction to abate NO_x and visible emissions by July 1, 1974.
- 4) Finish construction for the control of visible and NO_x emissions by May 2, 1975.
- 5) Latest date NO_x and visible emission regulation will be complied with, July 1, 1975.

Any comments you have on the regulation or the schedule should be presented at the public hearing. We will be glad to answer any questions you have on this matter.

Yours very truly,

W. E. Linne
Regional Administrator
West Central Region

WEL/WMH/pm



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

DEPARTMENT OF ELECTRIC AND WATER UTILITIES
Operations Center • 1000 East Parker Street • P. O. Box 368

C. D. McINTOSH, JR.
Director

*Mr. Linn met
682-1121*

August 2, 1973

Mr. W. E. Linne
Regional Administrator
Department of Pollution Control
2562 Executive Center Circle, East
Montgomery Building
Tallahassee, Florida 32301

Dear Mr. Linne:

Subject: Your letter of July 12, 1973
Polk Co. AP
Lakeland Power Plant

Enclosed you will find a copy of a letter from our consultants, KVB Engineering, dated July 30, 1973 and a copy of their proposed test and report schedule.

We respectfully request a variance from the compliance schedule which you propose to recommend at the August 9, 1973 public hearing so as to allow us to proceed with the schedule as proposed by our consultants. Upon receipt of KVB's final report, in which they will make recommendations for modifications to meet Florida air pollution rules, we will make modifications as soon as possible.

Very truly yours,

C. D. McIntosh, Jr.

CDM:lw
Enclosure
cc: KVB Engineering





ENGINEERING

17332 IRVINE BLVD., TUSTIN, CALIFORNIA 92680 • (714) 832-9020

July 30, 1973

Mr. C. D. McIntosh, Jr., Director
Department of Electric and Water Utilities
P. O. Box 368
Lakeland, Florida 33802

RECEIVED

AUG 1 1973

Subject: Testing Schedule for NO_x and Visible
Emissions on Steam Generating Units

D. D. McINTOSH, JR., Director
DEPT. OF ELECTRIC & WATER UTILITIES
CITY OF LAKELAND
LAKELAND, FLORIDA

Dear Mr. McIntosh:

boilers
I have enclosed a proposed test schedule for four steam generators at the Larsen plant (units 9, 10, 11 and 12) and for unit 10 at plant 3. The plan calls for a completion of test efforts at the end of January 1974 with a final report on the results submitted by March 1, 1974. The contents of the final report will include the particulate and NO_x emission levels for these five boilers as they are presently operated and an assessment of modifications that will be necessary to meet Florida air pollution rules covered in chapter 17-2 FAC.

As we have discussed previously, in many cases no physical modification of the boilers is necessary to meet the particulate, SO_x and NO_x emission regulations. In a great number of cases only combustion modifications are required to meet the NO_x and particulate regulations. These modifications usually require only minor physical modifications to the burners and controls. Some units, however, may require extensive modifications such as gas recirculation to the windbox or complete burner modifications in order to meet the Florida regulations.

In cases where it is deemed necessary to extensively modify the units it is doubtful that bids could be received, a contract be let and construction begin by July 1, 1974. It would therefore be advisable to ask the Florida DPC to extend the July 1, 1974 construction start date. At a very minimum it should be extended three months. In addition, the date for the final control plan for compliance with NO_x and visible emissions should be requested to be extended from December 1, 1973 to approximately March 15, 1974.

K V B ENGINEERING, INC.

Mr. C. D. McIntosh, Jr.
Department of Electric & Water Utilities

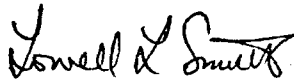
July 30, 1973
Page 2

It is KVB's opinion that Lakeland's Department of Electric and Water Utilities has already complied with item 2 in the letter from Mr. Linne of the DPC dated July 12, 1974. We believe that this has been complied with by retaining KVB to perform the NO_x and particulate emission reduction test effort.

Should you need any further information or assistance before the 9 August public hearing please don't hesitate to contact me.

Sincerely yours,

KVB, INCORPORATED



Lowell L. Smith
Southern States Regional Manager

LLS:js

Enclosure

K V B ENGINEERING, INC.

July 30, 1973

LAKELAND TEST AND REPORT SCHEDULE

Test Schedule

| | |
|---------------------|---|
| 10/15/73 | Begin test effort at plant No. 3 |
| 10/15/73 - 11/5/73 | Plant 3 Unit 10 - NO _x , Particulate tests |
| 11/6/73 - 11/27/73 | Larsen Unit 12 - NO _x , Particulate tests |
| 11/28/73 - 12/14/73 | Larsen Unit 11 - NO _x , Particulate tests |
| 12/17/73 - 1/10/74 | Larsen Unit 10 - NO _x , Particulate tests |
| 1/11/74 - 1/29/74 | Larsen Unit 9 - NO _x , Particulate tests |

Report Schedule

| | |
|----------|---|
| 11/30/73 | Letter report on test results and preliminary recommendations on Plant 3 Unit 10 |
| 12/17/73 | Letter report on test results and preliminary recommendations on Larsen Unit 12 |
| 1/18/74 | Letter report on test results and preliminary recommendations on Larsen Unit 11 |
| 2/1/74 | Letter report on test results and preliminary recommendations on Larsen Unit 10 |
| 3/1/74 | Final report on 5 steam generating units and recommendations for modifications to meet Florida Air Pollution Rules. |



City of Lakeland

WORLD CITRUS CENTER
LAKELAND, FLORIDA 33802

D. P. C.

SEP 18 1972

DEPARTMENT OF ELECTRIC AND WATER UTILITIES
Operations Center • 1000 East Parker Street • P. O. Box 388

C. D. McINTOSH, JR.
Director

WEST CENTRAL REGION

| | |
|-----------------|-------|
| Reg. Eng. | _____ |
| Asst. Reg. Eng. | _____ |
| Ch. Chemist | _____ |
| Air Engineer | _____ |
| Water Eng. | _____ |
| Permit Eng. | _____ |
| Biologist | _____ |
| Poll. Spec. | _____ |
| Water Chem. | _____ |
| Air Chemist | _____ |
| Amb. Air | _____ |
| Plant Air | _____ |
| Secretaries | _____ |
| FILE | _____ |

September 15, 1972

Department of Air & Water Pollution Control
225 Avenue D. N.W.
Winter Haven, Florida

Attention: Mr. Willard Hanks

Gentlemen:

On September 14, 1972 we submitted a notice of intent to construct one General Electric Company model PG-5341 oil fired gas turbine generator.

Please correct the installed date in the last paragraph of this notice to read February 1973.

Very truly yours,

C.D. McIntosh, Jr.

C.D. McIntosh, Jr., Director
Department of Electric & Water Utilities

CDM:lk

