



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 19, 2007

Electronic Mail – Received Receipt Requested

Mr. Timothy Bachand, Authorized Representative (timothy.bachand@lakelandelectric.com)
Lakeland Electric
501 East Lemon Street, MS-M01
Lakeland, Florida 33801

Re: C.D. McIntosh, Jr. Power Plant
DEP File No. 1050004-019-AC and PSD-FL-387(A)
Addition of Selective Catalytic Reduction to Unit No. 3
Request for Additional Information

Dear Mr. Bachand:

As you are aware, the addition of selective catalytic reduction (SCR) to the C.D. McIntosh, Jr. Power Plant Unit No. 3 has been set up as a separate project under Department File No. 1050004-019-AC and PSD-FL-387(A). Review of your letter received on January 29, 2007, reveals that further information is needed on the following item, and thus we have deemed your application still incomplete for this phase of the overall project.

We note that you have updated the Process Flow Diagram to include the ammonia injection subsystem to control sulfur trioxide production. Please provide more details regarding the operating parameters of this subsystem. Specifically, please provide comments concerning the development of an ammonia injection rate curve, and associated algorithm, such that the sulfuric acid mist (SAM) emissions do not exceed the baseline annual emissions by the PSD significant emission rate (7 tons/year or more) annually.

Using an appropriate experimental design, we recommend that the ammonia injection rate be developed for different operating loads. At each operating load, stack testing should be done for differing values of sulfur content of the fuel used. The stack tests will measure the controlled SAM emissions rate, and the data points can be used to develop an ammonia injection rate curve for each load and varying sulfur content of the fuel. The testing should be done annually. The initial ammonia injection rate curve should be submitted to the Department within six months after initial operation of the SCR system.

Mr. Timothy Bachand
February 19, 2007

When we receive this information, we will continue processing your application. We are available to discuss the details of our request for additional information. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days. If you have any questions, please contact Tom Cascio at 850-921-9526.

Sincerely,



A. A. Linero, P.E.
Program Administrator
Permitting South Section

AAL/tbc

Cc: Farzie Shelton, Lakeland Electric (farzie.shelton@lakelandelectric.com)
Mara Nasca, Southwest District Office (mara.nasca@dep.state.fl.us)
Kennard F. Kosky, P.E., Golder Associates, Inc. (kkosky@golder.com)
Debbie Nelson, Bureau of Air Regulation (deborah.nelson@dep.state.fl.us)

Adams, Patty

From: Harvey, Mary
Sent: Tuesday, February 20, 2007 10:03 AM
To: Adams, Patty
Subject: FW: ltr. Mr. Timothy Bachand - Facility #1050004-019-AC

From: Shelton, Farzie [<mailto:Farzie.Shelton@lakelandelectric.com>]
Sent: Monday, February 19, 2007 4:20 PM
To: Harvey, Mary
Subject: Read: ltr. Mr. Timothy Bachand - Facility #1050004-019-AC

Your message

To: Farzie.Shelton@lakelandelectric.com
Subject:

was read on 2/19/2007 4:20 PM.

Adams, Patty

From: Harvey, Mary
Sent: Monday, February 19, 2007 3:19 PM
To: 'timothy.bachand@lakelandelectric.com'; 'farzie.shelton@lakelandelectric.com'; 'kkosky@golder.com'; Nelson, Deborah; Zhang-Torres
Cc: Cascio, Tom; Adams, Patty; Gibson, Victoria
Subject: Ltr. Mr. Timothy Bachand - Facility #1050004-019-AC
Attachments: TIMOTHY BACHAND LTR. ID #1050004-019-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation