



Farzie Shelton, ChE; REM

Associate GM Technical Support

CERTIFIED MAIL

September 25, 2009

Mr. Jonathan Holtom, P.E.
Title V Program Administrator
Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

SEP 28 2009

BUREAU OF AIR REGULATION

**SUBJECT: Selective Catalytic Reduction System Construction Permit #1050004-019-AC
C.D. McIntosh, Jr. Power Plant – facility ID #1050004; E.U. 006
Expiration Date Extension Request**

File # 1050004-026-AC

Dear Mr. Holtom:

On August 31, 2007, Lakeland Electric received the above referenced construction permit to install an ammonia injection system using the principle of selective catalytic reduction (SCR) on Unit 3 (E.U. 006) as the second phase of a project to provide full flexibility in implementing the federal cap and trade program for nitrogen oxides (NO_x) under the Clean Air Interstate Rule (CAIR). Presently, Lakeland Electric has not finished construction of the SCR or sorbent injection systems cited in the above referenced permit, and requests additional time to complete the construction of these systems. Additionally, Specific Condition 15. of the construction permit requires that Unit 3 fire its fuel blend with the highest sulfur content, which would be coal with a 20 percent mixture of petroleum coke. Due to maintenance and economic costs inherent with firing petroleum coke, Unit 3 has not been firing any petroleum coke and most likely will not for initial testing purposes. If this is the case, Lakeland Electric is aware that retesting may be required in the future if petroleum coke is fired to confirm the unit's emissions are within sulfuric acid mist emission limits.

Therefore, Lakeland Electric requests that the expiration date of the construction permit be extended to December 31, 2010, as such will allow ample time for completing construction, performing emissions testing, reviewing test results and submitting a revised application to the Department.

As always, we appreciate if you would process our request at your earliest convenience. Enclosed with this letter, please find a Certification Page signed by Lakeland Electric's Authorized Representative, Mr. Timothy Bachand. If you have any questions, please do not hesitate to contact me.

Sincerely,

For Farzie Shelton
Farzie Shelton

Enclosure: A.R. Certification (T. Bachand)

City of Lakeland • Department of Electric Utilities

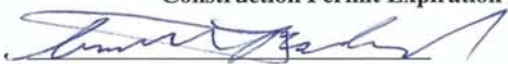
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APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Mr. Timothy Bachand, P.E., Manager of Engineering
2. Application 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 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, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 East Lemon Street City: Lakeland State: FL Zip Code: 33801-5079
4. Application Responsible Official Telephone Numbers... Telephone: (863) 834 - 6633 ext. Fax: (863) 834 - 5670
5. Application Responsible Official E-mail Address: Timothy.Bachand@lakelandelectric.com
6. Application Responsible Official Certification: <p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p>SUBJECT: C.D. McIntosh Power Plant (#1050004) Unit 3 Selective Catalytic Reduction System Construction Permit Expiration Date Extension Request</p> <p> Signature</p> <p><u>9/23/09</u> Date</p>