



Farzie Shelton, ChE; REM

Associate GM Technical Support

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OCT 11 2011

DIVISION OF AIR
RESOURCE MANAGEMENT

CERTIFIED MAIL & VIA E-MAIL

October 5, 2011

Mr. Jonathan Holtom, P.E.
Environmental Administrator
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400
(submitted via Jonathan.Holtom@dep.state.fl.us)

**RE: C.D. McIntosh, Jr. Power Plant – DEP File Nos. 1050004-029-AV, and
1050004-025-AC
Request for Administrative Permit Changes**

Dear Mr. Holtom,

project No: 1050004-030-AC
1050004-031-AV

Lakeland Electric (Lakeland) is requesting three minor administrative actions in order to revise two conditions of Permit No. 1050004-029-AV and extend the expiration date of Permit No. 1050004-025-AC. The specific provisions and requested changes are detailed below:

A. Permit No. 1050004-029-AV

SO₂ monitoring methods:

Units 1 (EU 001) and 2 (EU 005) at the C.D. McIntosh, Jr. Power Plant are required to either perform fuel sampling or retain delivered fuel manifests from vendors that detail the fuel sulfur content of any fuel oil that is to be utilized within each of these two units to comply with each unit's SO₂ permit limit. Compliance is determined by either using the fuel manifest sulfur content or by calculating SO₂ emissions out of the unit. In addition, both of these units are equipped with SO₂ analyzers under the Federal Acid Rain Program (ARP) and the analyzers currently report SO₂ emissions in lb/MMBtu values.

Lakeland would prefer to minimize duplicate reporting and compliance measures where available, and therefore, would prefer to demonstrate compliance for both units for SO₂ emissions by using each individual unit's Part 75 ARP analyzer as the compliance method for each unit's SO₂ permit limit. Lakeland personnel have discussed this issue previously with Department staff and Lakeland believes the Department can make such revisions without the need for issuance of a construction permit. Revising the SO₂ compliance method will assist Lakeland and the Department in reducing duplicate compliance measures.

The permit conditions concerned by this revision are: (1) S.C. A.9., and (2) S.C. D.12. of the above cited permit.

Unit 3 Refuse as Fuel:

Unit 3 (EU 006) is permitted to burn refuse derived fuel as one of its allowed fuel sources under the current permit. Lakeland would prefer to delete the permit allowance for the ability to burn refuse derived fuel in Unit 3 by this letter. Unit 3 has not utilized refuse in its boiler in recent years nor are there any current plans to do such in the near future. Lakeland personnel also believe that leaving the condition in the permit may require Unit 3 to comply with additional requirements under separate regulations in the future. Therefore, Lakeland requests that the ability to burn refuse derived fuel be removed from the current permit. Lakeland personnel have discussed this issue previously with Department staff and Lakeland believes the Department can make such revision without the need of a construction permit.

The main permit conditions concerned by this revision are: (1) S.C. E.3., and (2) S.C. E.5., however, "refuse" is cited in additional conditions in Unit 3's section of the permit and those references should be deleted also.

B. Permit No. 1050004-025-AC

Coal Yard Extension:

Lakeland requests an extension to Permit No. 1050004-025-AC in order to further evaluate and complete the final design and finalize construction of the C.D. McIntosh, Jr. Power Plant coal yard modifications as applied for in Permit No. 1050004-024-AC. Due to recent regulatory and market changes, Lakeland requests additional time in order to assess and plan for future conditions. Therefore, Lakeland requests a two-year extension to its current expiration date of December 31, 2011 to December 31, 2013 in order reevaluate its original construction plans.

City of Lakeland • Department of Electric Utilities

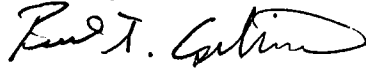
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If you should have any questions regarding the above requests please do not hesitate to contact me or Mr. Bret Galbraith at (863) 834-8180. Thank you.

Sincerely,


for Farzie Shelton

Enclosure: R.O. cert. page (T. Candales)

cc: Ms. Cindy Zhang-Torres, PE (sent certified & electronic)
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FL Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Mr. David McNeal (sent certified & electronic)
US EPA, Region IV
Air, Pesticides & Toxics Management Division
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Mr. Martin Costello, PE (sent electronic)
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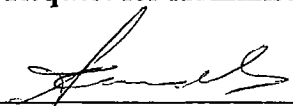
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Responsible Official Certification

DIVISION OF AIR
RESOURCE MANAGEMENT

1. Responsible Official Name :
Tony Candales, Assistant General Manager of Production
2. Responsible Official Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 E. Lemon St. City: Lakeland State: FL Zip Code: 33801 -5079
3. Owner/Authorized Representative Telephone Numbers... Telephone: (863) 834-6559 ext. Fax: (863) 834-6362
4. Responsible Official Email Address: TONY.CANDALES@LAKELANDELECTRIC.COM
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official of the Title V source addressed in this submittal. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this submission are true, accurate and complete. The air pollutant emissions units and air pollution control equipment described in this submittal 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 submittal to which the Title V source is subject. 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 any compliance plan(s) previously submitted.</i> RE: C.D. McIntosh, Jr. Power Plant – DEP File Nos. 1050004-029-AV, and 1050004-025-AC Request for Administrative Permit Changes  _____ Signature _____ Date 10/5/11