

Svec, Ed

From: Kosky, Ken [KKosky@GOLDER.com]
Sent: Friday, September 26, 2003 9:04 AM
To: Svec, Ed; Holtom, Jonathan
Cc: Farzie Shelton (Farzie.Shelton@lakelandelectric.com)
Subject: City of Lakeland McIntosh Title V - Compliance and CAM Information

Ed/Jonathan: As we discussed yesterday concerning the Department's September 5, 2003 letter, I am forwarding some charts of actual Acid Rain opacity data for McIntosh Unit 3. The data evaluated was a typical 3 month period of one hour average data. There are two charts. The frequency chart is the number of 3-hour averages in a particular opacity range. As shown in the chart, most of the values would be below the excursion value of 13 percent. However, there are opacity levels above the excursion where actions would have to be implemented or otherwise flagged (e.g., startup and shut down). It should be noted these data are block 3-hour average values. A rolling 3-hour value consistent with the averaging time for the particulate standard would likely be similar. However, since this would be tracked on a 1-hour basis, the City would have plenty of opportunity to take appropriate action as the average approaches the excursion value.

The second chart also shows 1-hour opacity versus load. Again, most of the values are below the excursion value.

Also, as discussed yesterday, adding following language in the Title V Permit (Specific Condition E9) would exempt the City from the requirements of CAM: "Compliance with the percent reduction requirement and lb/MMBtu emission rate determined on a 30-rolling average". The City currently uses the lb/MMBtu since it is more stringent requirement than the percent reduction.

Please e-mail or call if there are any further questions.

Regards, Ken

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9/29/2003

Lakeland Electric
CD McIntosh Jr. Power Plant

Sample Time		Number of Readings	
Start Date	End Date	1-hour	3-hour Avg.
4/1/2002	6/30/2002	2,183	728

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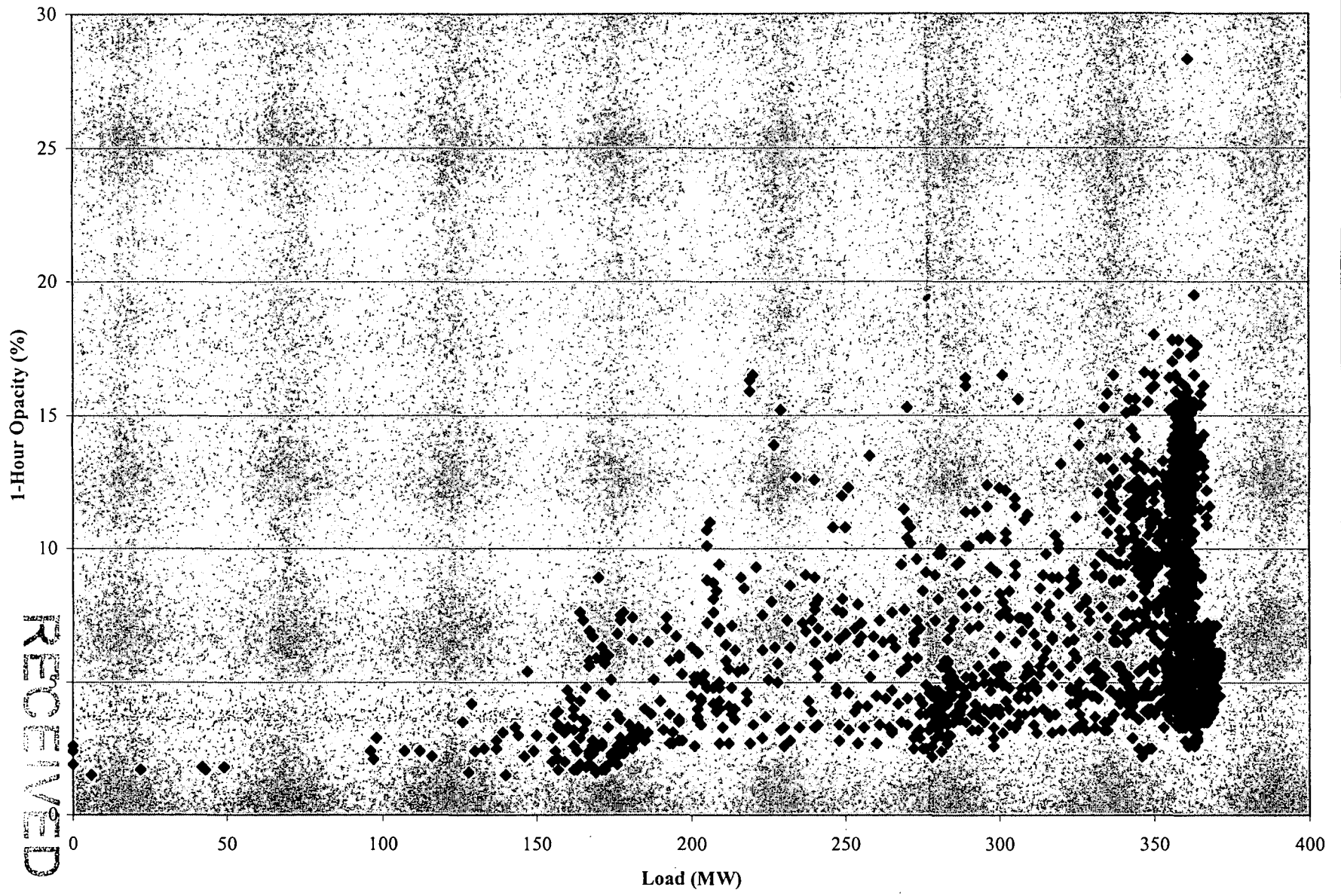
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CEM Opacity Frequency 4/1/02 - 6/30/02

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