



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

Certified Mail – Return Receipt Requested

June 11, 2003

Mr. Timothy C. Bates  
Director of Energy Supply  
Lakeland Electric  
501 East Lemon Street  
Lakeland, Florida 33801-5079

Re: Title V Air Operation Permit Renewal Application  
**C. D. McIntosh, Jr. Power Plant**  
Facility ID: 1050004

Dear Mr. Bates:

Thank you for your submission of April 30, 2003, for a Title V Air Operation Permit Renewal for the referenced facility. The Department has reviewed your request and has determined the application to be incomplete, for the following reasons:

1. Because the SO<sub>2</sub> emissions standard for Unit 3 is not an Acid Rain emissions limit, Unit 3 is not automatically exempt from CAM pursuant to 40 CFR 64.2(b)(iii) just because the unit is using an Acid Rain SO<sub>2</sub> CEM. However, the use of the Acid Rain SO<sub>2</sub> CEM could qualify the unit for an exemption from the CAM requirements. Pursuant to 40 CFR 64.2(b)(vi), if Lakeland Electric chooses to use this CEM as a continuous compliance determination method, rather than just a monitoring method as required by 40 CFR 60.47a, Unit 3 could be exempt from the CAM requirements for emissions of SO<sub>2</sub>.

Please provide either, a statement that Lakeland Electric wishes to have the SO<sub>2</sub> CEM listed in the permit as the continuous compliance determination method, or an acceptable CAM plan for the FGD. The use of the Acid Rain CEM is a presumptively acceptable method of satisfying the CAM requirements, but must be written into the permit in a CAM plan.

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2. Unit 3 is subject to CAM for PM emissions controlled by an ESP. Lakeland Electric proposed the use of the COMS for monitoring opacity as an indicator that the ESP is functioning properly. Various levels of opacity were also presented in the application as indicator ranges for the different types of fuel being fired. The selected opacity indicator ranges appear to be high based on the one test submitted with the application. Since there is not a consistent or well defined correlation between PM emissions and opacity, please provide additional test data to support your choice of indicator ranges. Also, to avoid recordkeeping problems while switching between different types of fuels, explore the feasibility of choosing a single maximum opacity reading for all types of fuels. Also, please provide data showing the correlation between tested PM emissions levels and ESP voltage for the different fuel types that are allowed to be fired. Consider identifying a minimum ESP voltage as an indicator of performance instead of, or in addition to, opacity.

When the Department has received all of the requested information, we will resume processing your application for permit revision. Until then, if you have any questions or require further assistance, please contact Edward J. Svec at 850/921-8985.

Sincerely,



Scott M. Sheplak, P.E.  
Administrator  
Title V Section

Cc: Kennard Kosky, P.E., Golder Associates Inc.  
Eric Peterson, P.E., DEP SW District  
Farzie Shelton, Lakeland Electric