



July 7, 1997

Clair H. Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RE: C.D. McIntosh, Jr. Power Plant
Title V Permit Application No. 1050004-003-AV
Polk County, Florida

Dear Clair:

Pursuant to Rule 62-4.050 and 62-213 Florida Administrative Code, the Lakeland Electric and Water Utilities hereby submits to the Florida Department of Environmental Protection's Bureau of Air Regulation (Department) a revision to the Title V permit application, in quadruplicate, for the C.D. McIntosh Jr. Power Plant. This submittal revises the Attachment LMC-FE-4 "Precautions To Prevent Emissions Of Unconfined Particulate Matter". The enclosed document has been signed and sealed by Mr. Ken Kosky, P.E. of Golder Associates, Inc. and certified by Lakeland's Responsible Official Mr. Ronald W. Tomlin, Assistant Managing Director.

Sincerely

Farzie Shelton
Environmental Division

Enc.

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BUREAU OF
AIR REGULATION

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Ronald W. Tomlin, Assistant Managing Director
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Lakeland Electric & Water Utilities Street Address: 501 East Lemon Street City: Lakeland State: FL Zip Code: 33801-5079
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941) 499-6300 Fax: (941) 499-6344
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.</i> <p><u>Ronald W. Tomlin</u> <u>7-3-97</u> Signature Date</p>

* Attach letter of authorization if not currently on file.

4. Professional Engineer's Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

[Handwritten Signature]

1 July 1997

Signature
(seal)

Date

Attach any exception to certification statement.

ATTACHMENT LMC-FE-4
PRECAUTIONS TO PREVENT EMISSIONS
OF UNCONFINED PARTICULATE MATTER

The facility has small amounts of unconfined particulate matter as a result of the operation of the facility. Sources of particulate matter include:

- Fugitive dust from paved and unpaved roads,
- Fugitive particulates from the use of bagged chemical products,
- Coal handling and storage,
- Limestone handling and storage,
- FGD/ash by-products/handling and storage,
- Municipal solid waste,
- Ash cleaning, and
- Paint removal.

Operational measures are undertaken at the facility which also minimize particulate emissions, in accordance with 62-296.320(4)(c), F.A.C.:

- Maintenance of paved areas,
- Regular mowing of grass and care of vegetation, and
- Limiting access to plant property by unnecessary vehicles.