Florida Department of Environmental Protection

Memorandum

To: Joseph Kahn, Division of Air Resource Management

Through: Trina Vielhauer, Bureau of Air Regulation
Jeff Koerner, New Source Review Section

From: Christy DeVore, New Source Review Section

Date: June 18, 2010

Subject: Final Air Permit No. 1050004-026-AC
Lakeland Electric, C.D. McIntosh, Jr. Power Plant
Permit Extension and Revision

The final permit for this project is attached for your approval and signature. The project requires a minor air construction permit to: extend the permit expiration date; revise the ammonia slip requirement; revise and clarify the sulfuric acid mist emissions testing and reporting requirements; and establish a new nitrogen oxides emissions limitation for Unit 3. The proposed work will be performed at the existing C.D. McIntosh, Jr. Power Plant, which is located in Polk County at 3030 East Lake Parker Drive in Lakeland, Florida. The project is not considered a new source review reform project.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

TLV/jfk/scd

PERMITTEE

City of Lakeland, Department of Electric Utilities
Lakeland Electric
501 East Lemon Street
Lakeland, FL 33801-5050

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 1050004-026-AC
Minor Air Construction Permit
C.D. McIntosh, Jr. Power Plant

This permit extends the permit expiration date; revises the ammonia slip requirement; revises and clarifies the sulfuric acid mist emissions testing and reporting requirements; and establishes a new nitrogen oxides emissions limitation for Unit 3.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on June 2, 2010. The applicant published the Public Notice in the The Ledger on June 4, 2010. The Department received the proof of publication on June 11, 2010. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the permit with no changes.

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

City of Lakeland, Department of Electric Utilities
Lakeland Electric
501 East Lemon Street
Lakeland, FL 33801-5050

Authorized Representative:
Mr. Tom Trickey, Plant Manager

Air Permit No. 1050004-026-AC
Permit Expires: March 31, 2011

C.D. McIntosh, Jr. Power Plant
Unit 3 SCR Project
Permit Extension and Revision

PROJECT

This is the final air construction permit, which revises original Permit No. 1050004-019-AC to: extend the permit expiration date; establish a new nitrogen oxides emissions limitation for Unit 3; and clarify the sulfuric acid mist emissions testing and reporting requirements. The project is being constructed at the existing C.D. McIntosh, Jr. Power Plant, which is located in Polk County at 3030 East Lake Parker Drive in Lakeland, Florida.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

Joseph Kahn, Director
Division of Air Resource Management

6/21/10
(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 6/22/10 to the persons listed below.

Mr. Tom Trickey, Lakeland Electric (tom.trickey@lakelandelectric.com)
Ms. Farzie Shelton, Lakeland Electric (farzie.shelton@lakelandelectric.com)
Mr. Bret Galbraith, Lakeland Electric (bret.galbraith@lakelandelectric.com)
Ms. Cindy Zhang-Torres, DEP SW District (cindy.zhang-torres@dep.state.fl.us)
Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 6/22/10 (Date)

FACILITY DESCRIPTION

The facility is an existing power plant, which is categorized under Standard Industrial Classification Code No. 4911. The UTM coordinates are Zone 17, 409.0 km East and 3106.2 km North.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility operates units subject to the Clean Air Interstate Rule (CAIR).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROPOSED PROJECT

Fossil Fuel Steam Generator Unit 3 (Emissions Unit No. 006) is a nominal 364 megawatt fossil fuel-fired steam generator that burns primarily coal or blends of coal and petroleum coke (petcoke) and small amounts of refuse derived fuel (RDF). The maximum heat input rate is 3640 million British thermal units (MMBtu) per hour. The steam generator is supplied by Babcock and Wilcox. It is a balance-draft "late 1970's design" with 16 burners located on the front wall and 16 burners located on the back wall. The burners are fed by two coal pulverizers located on the front wall and two on the back wall. Particulate matter emissions are controlled by an existing electrostatic precipitator (ESP). Low-NO_X burners (LNBs) and over-fire air (OFA) systems control nitrogen oxides (NO_X) and a wet limestone scrubber reduces sulfur dioxide (SO_2) emissions. Permit No. 1050004-019-AC authorized the installation of a selective catalytic reduction (SCR) system to reduce NO_X emissions and a sorbent injection system to reduce sulfuric acid mist (SAM) emissions.

The permit extension is needed to complete miscellaneous construction activities, conduct performance testing, review and submit test results and submit an application for a revised Title V air operation permit to incorporate the applicable requirements of the air construction permit. Clarifications to the SAM emissions testing and reporting requirements are necessary to bridge the gap between the original permit requirements, the initial test protocol and the revised letter of authorization to conduct initial SAM performance tests.

The permittee is installing the new SCR system to provide flexibility to comply with the federal Clean Air Interstate (CAIR) program. However, based on current ambient monitoring data for nearby Hillsborough County, this area is likely to be designated as nonattainment for the new federal ozone standard (75 parts per billion). To help mitigate prospective ozone problems in this area, this permit specifies a new NO_X emissions limitation based on annual average NO_X emissions after implementing the newly installed LNB and OFA equipment and the SCR system design. In accordance with Rule 62-4.080, F.A.C., the Department determines that a higher degree of treatment is necessary to improve the area's air quality, which can be achieved with the installed equipment without unreasonable hardship.

Permit Being Modified: Permit No. 1050004-019-AC
Affected Emissions Units: McIntosh Unit 3 Fossil Fuel Fired Steam Generator (EU-006)

The expiration date is hereby extended from **December 31, 2009** to **March 31, 2011**. The purpose is to provide sufficient time to complete the work and submit an application to revise the Title V air operation permit.

Section 3, Specific Conditions 12, 13, 15, 16, 17, 18 and new 24: These conditions are revised as follows.

EMISSION LIMITS AND STANDARDS

12. Ammonia Emissions (Slip). Subject to the requirements of Condition 19 in this section, the SCR system shall be designed and operated for an ammonia slip target of less than 5 ppmv based on the average of three, 1-hour test runs. [Rule 62-4.070(3), F.A.C.]

13. Emission Limits.

    a. CO Emission Limit Subject to Revision: *(No other change to the CO emissions limit).*

    b. NOx Emission Limit: NOx emissions from Unit 3 shall not exceed 0.22 lb/MMBtu of heat input based on a calendar year average of all periods of operation, including startup, shutdown and malfunction. The permittee shall begin collecting and averaging data towards a demonstration of compliance with the new NOx emissions limitation beginning January 1, 2011.

    [Rules 62-4.080, 62-210.300 and 62-4.055, F.A.C.]

EMISSIONS PERFORMANCE TESTING

15. SAM Performance Tests and Sorbent Injection for SAM Emissions Control. The permittee shall conduct a series of initial performance tests to determine the SAM emissions rate under a variety of operating scenarios that documents the impact of sorbent injection on reducing SAM emissions and results in the development of correlation/curves between injection rates, operating conditions and emissions.

    The permittee shall conduct stack tests to determine the uncontrolled sulfuric acid mist emission rate, the controlled sulfuric acid mist emission rate, and actual control efficiency of the installed sorbent injection system. Tests shall be conducted while firing the fuel blend with the highest sulfur content that will be fired in the unit. During each test run, the permittee shall continuously monitor and record the sorbent injection rate. The purpose of these tests is to determine actual control efficiency of the installed systems and to establish the correlation between SAM emissions and the sorbent injection rate, which will be used to calculate the actual annual emissions.

    a. Within 90 days of first injecting ammonia to the SCR system, the permittee shall conduct the following initial tests:

        1) The permittee shall conduct at least two, 1-hour test runs at each of the following operating scenarios to determine SAM emissions.

Scenario	Load	Sorbent Injection
1A	100% load	Off
1B	**100% load**	**ON**
2A	88% load	Off
2B	**88% load**	**ON**

Scenario	Load	Sorbent Injection
3A	69% load	Off
3B	69% load	ON

The operator shall use best efforts to obtain and maintain the approximate target unit load throughout the test run for each operating scenario.

2) All test runs shall be conducted while injecting ammonia for the control of nitrogen oxides (NO_X).

3) The sorbent injection rate used for each operating scenario shall be determined by the equipment vendor.

4) For each SAM test run the operator shall:

   a) Record the ammonia injection rate;

   b) Record the sorbent injection rate;

   c) Determine the fuel firing rate and heat input rate;

   d) Use the stack CEMS to determine controlled NO_X and SO_2 emissions; and

   e) Attempt to sample uncontrolled SO_2 emissions before the flue gas desulfurization system. If unable to gather meaningful uncontrolled SO_2 data for these initial tests, the permittee shall determine the uncontrolled SO_2 emissions by actual fuel flow and sulfur content.

5) Appropriate reference test methods shall be used to determine SAM and SO_2 emissions as necessary for the given operating conditions.

6) At a minimum, the permittee shall submit a test report within 45 days of completing the initial performance tests to include the following information for each SAM test run: the load; the heat input rate; the test method with any variations noted; the fuel blend fired and the average sulfur content; the actual sorbent injection rate; the controlled SO_2 emissions rate as determined by the CEMS; the uncontrolled SO_2 emissions rate as determined by stack test (if not available, then as determined by fuel flow and sulfur content); the ammonia injection rate for NO_X control by the SCR; the controlled NO_X emissions rate as determined by CEMS; the stack opacity as determined by the continuous opacity monitoring system (COMS). The report shall discuss the relative influence of operating parameters and how the sorbent injection rate will be adjusted for differing operating scenarios.

7) Until the test results are known, the permittee shall continue to operate the sorbent injection system based on the sorbent injection rate recommended by the equipment vendor. Once the tests results are known, the permittee may begin to operate the sorbent injection system based on the performance indicated by the data collected during the initial tests such that SAM emissions increases from the project will be less than 7 tons/year. The permittee shall identify and monitor the operating conditions that would result in an adjustment of the sorbent injection rate.

b. Within 60 days of conducting the initial round of performance tests, the permittee shall propose a new schedule and revised test protocol for conducting the originally proposed tests including the determination of the SAM conversion rate across the SCR catalyst. Within 120 days of submitting the test report for the initial tests, the permittee shall conduct the following additional tests:

   1) For each set of operating conditions being evaluated, the permittee shall conduct at least a 1-hour test run to determine SAM emissions. At least nine such test runs shall be conducted to evaluate the effect on SAM emissions from such parameters as the SO_2 emission rate prior to the SCR catalyst (and FGD

system), the unit load, the flue gas flow rate, the sorbent injection rate and the current catalyst oxidation rate.

2) Tests shall be conducted under a variety of fuel blends and load rates that are representative of the actual operating conditions. Sufficient tests shall be conducted to establish the SAM emissions rates for the following scenarios: SCR reactor in service (ammonia injection) without sorbent injection, and SCR reactor in service (ammonia injection) under varying operating conditions and levels of sorbent injection.

3) At least 15 days prior to initiating the performance tests, the permittee shall submit a test notification, preliminary test schedule and test protocol to the Bureau of Air Regulation and the Compliance Authority.

4) Within 45 days following the last test run conducted, the permittee shall provide a report summarizing the emissions tests and results. All SAM emissions test data shall be provided with this report.

5) Within 45 days following the submittal of the emissions test report and no later than 90 days following the last test run conducted, the permittee shall submit a project report summarizing the following:

a) Identify each set of operating conditions evaluated;

b) Identify each operating parameter evaluated;.

c) Identify the relative influence of each operating parameter, describe how the automated control system will adjust the sorbent injection rate based on the selected parameters;

d) Identify the frequency with which operational parameters will be reevaluated and adjusted within the automated control system;

e) Provide the algorithm used for the automated control system or a series of related performance curves; and

f) Provide details for calculating and estimating the SAM emissions rate based on the level of sorbent injection and operating conditions. The test results shall be used to adjust the sorbent injection control system and estimate SAM emissions.

c. Within 45 days of firing a fuel blend with a sulfur content that is 0.20% sulfur by weight (based on a 14-operational day rolling average) higher than the maximum sulfur content previously tested, the permittee shall conduct the following additional SAM performance tests.

1) Conduct the SAM performance tests in accordance with the requirements of paragraph "b" of this condition, or

2) If the sorbent injection system is removed or is determined to be unnecessary for a given coal blend, conduct at least three, 1-hour test runs at permitted capacity to determine the SAM emissions rate.

The permittee shall use the data collected to calculate the actual SAM emissions when operating under the given conditions, including the period of time from first fire of the fuel blend until the performance test results are known.

[Rules 62-4.070(3) and 62-212.300(1)(e), F.A.C.]

16. Determining Actual SAM Emissions. On an annual basis, the permittee must demonstrate that SAM emissions increases as a result of this project are less than 7 TPY. The permittee shall operate the sorbent injection system at a frequency and injection rate for SAM control to satisfy this requirement. An automated control system will be used to adjust the sorbent flow rate for the given set of operating conditions based on the most recent performance test results. Actual SAM emissions shall be calculated using the information available for

the given operating conditions (e.g., the sulfur content of fuel blend, the SO_2 emission rate prior to the SCR catalyst, the unit load, the flue gas flow rate, the sorbent injection rate and the current catalyst oxidation rate). If performance testing shows that it is unnecessary to operate the sorbent injection system for a given coal blend or the sorbent injection system is removed, the permittee shall determine actual SAM emissions based on emissions factors developed through the performance tests.

[Rules 62-4.070(3) and 62-212.300(1)e, F.A.C.]

17. Performance Tests. After completing shakedown of the SCR-system, but no later than 180 days after first injecting ammonia in the SCR reactor, the permittee shall have the following tests conducted for the unit. At permitted capacity, the permittee shall conduct tests to determine the uncontrolled NO_X emissions rate, the controlled NO_X emission rate, and the actual control efficiency of the installed SCR system. Tests shall consist of at least three, 1-hour test runs. Alternatively, the permittee may provide representative CEMS data for this demonstration. During each test run, the permittee shall continuously monitor and record the ammonia injection rate.

    [Rule 62-297.310(7)(a)1, F.A.C.]

18. Ammonia Slip Tests: Initial and annual compliance with the ammonia (NH_3) slip limit shall be determined using EPA conditional test method (CTM-027), EPA method 320, or other methods approved by the Department. The initial test shall be completed within 180 days after first injecting ammonia in the SCR reactor. If the tested ammonia slip rate exceeds 5 ppmv during the test, the permittee shall:

    (a) Begin testing and reporting the ammonia slip for each subsequent calendar quarter;

    (b) Before the ammonia slip exceeds 7 ppmv, take corrective actions that result in lowering the ammonia slip to less than 5 ppmv; and

    (c) Test and demonstrate that the ammonia slip is less than 5 ppmv within 30 days after completing the corrective actions.

    Corrective actions may include, but are not limited to, adding catalyst, replacing catalyst, or other SCR system maintenance or repair. After demonstrating that the ammonia slip level is less than 5 ppmv, testing and reporting shall resume on an annual basis.

    [Rule 62-4.070(3), F.A.C.]

Add the following new condition:

24. New Control Equipment: In accordance with Rule 62-210.300(1)(a), F.A.C., if the sorbent injection system is removed, the permittee shall obtain an air construction permit to install new acid mist mitigation equipment or to reinstall the sorbent injection system if required to maintain SAM emissions below a 7 TPY increase above the baseline emissions, which were estimated at 136 TPY. [Rule 62-210.300(1)(a), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, June 22, 2010 1:02 PM
To: 'tom.trickey@lakelandelectric.com'
Cc: 'farzie.shelton@lakelandelectric.com'; 'bret.galbraith@lakelandelectric.com'; Zhang-Torres; Halpin, Mike; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Lakeland Electric - C.D. McIntosh, Jr. Power Plant; 1050004-026-AC
Attachments: 1050004-026-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: ***We must receive verification that you are able to access the documents.*** *Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Click on the following link to access the documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1050004.026.AC.F_pdf.zip

Owner/Company Name: LAKELAND ELECTRIC
Facility Name: C.D. MCINTOSH, JR. POWER PLANT
Project Number: 1050004-026-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: POLK
Processor: Christy DeVore

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Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Trickey, Tom [Tom.Trickey@lakelandelectric.com]
Sent: Thursday, July 01, 2010 12:45 PM
To: Livingston, Sylvia
Subject: RE: Lakeland Electric - C.D. McIntosh, Jr. Power Plant; 1050004-026-AC

I tried to prove you wrong. I found where twice I forwarded the e-mail and attachment, but I could not find where I acknowledged receipt. I apologize.

Received and read by Tom Trickey.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 01, 2010 12:36 PM
To: 'tom.trickey@lakelandelectric.com'
Subject: FW: Lakeland Electric - C.D. McIntosh, Jr. Power Plant; 1050004-026-AC

Dear Tom Trickey

We have not received confirmation that you were able to access the documents attached to this June 22nd e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

From: Livingston, Sylvia
Sent: Tuesday, June 22, 2010 1:02 PM
To: 'tom.trickey@lakelandelectric.com'
Cc: 'farzie.shelton@lakelandelectric.com'; 'bret.galbraith@lakelandelectric.com'; Zhang-Torres; Halpin, Mike; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)
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Owner/Company Name: LAKELAND ELECTRIC
Facility Name: C.D. MCINTOSH, JR. POWER PLANT
Project Number: 1050004-026-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: POLK
Processor: Christy DeVore

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Shelton, Farzie [Farzie.Shelton@lakelandelectric.com]
Sent: Tuesday, June 22, 2010 1:23 PM
To: Livingston, Sylvia
Subject: RE: Lakeland Electric - C.D. McIntosh, Jr. Power Plant; 1050004-026-AC

Thank you.

Farzie Shelton
Associate General Manager Technical Support
Lakeland Electric
501 E. Lemon Street
Lakeland, Florida 33801
863.834.6603
Cell: 863.430.8297

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, June 22, 2010 1:02 PM
To: Trickey, Tom
Cc: Shelton, Farzie; Galbraith, Bret; Zhang-Torres; Halpin, Mike; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)
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Livingston, Sylvia

From: Galbraith, Bret [Bret.Galbraith@lakelandelectric.com]
Sent: Tuesday, June 22, 2010 1:22 PM
To: Livingston, Sylvia
Subject: RE: Lakeland Electric - C.D. McIntosh, Jr. Power Plant; 1050004-026-AC

Sylvia,
I have received this e-mail and attachments; thank you.

Bret Galbraith, E.I. | **Environmental Permitting**| Lakeland Electric
501 E. Lemon St. | Lakeland, FL 33810 |**office**: 863-834-8180 **cell**: 813-351-0149 |**fax**: 863-834-8187 |**e-mail**: bret.galbraith@lakelandelectric.com

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To: Trickey, Tom
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Facility County: POLK
Processor: Christy DeVore

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