



# 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

August 6, 2008

*Sent via Electronic Mail - Received Receipt Requested*

[timothy.bachand@lakelandelectric.com](mailto:timothy.bachand@lakelandelectric.com)

Mr. Timothy Bachand, P.E.  
Manager of Engineering  
Lakeland Electric  
501 East Lemon Street  
Lakeland, FL 33801-5079

Re: Request for Additional Information  
Project Number 1050004-023-AV, Title V Air Operation Permit Renewal Application  
C. D. McIntosh, Jr. Power Plant

Dear Mr. Bachand:

The Department received the subject application for a Title V air operation permit renewal via the hard copy submittal on July 3, 2007. The C. D. McIntosh, Jr. Power Plant is located in Polk County at 3030 East Lake Parker Drive, Lakeland.

In order to continue processing your application, the Department will need the additional information items requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revisions to the application.

## **Additional Information Items**

1. New Applicable Requirements - Compliance Assurance Monitoring (CAM).  
The U.S. EPA promulgated and the State of Florida adopted the CAM federal regulation, 40 CFR 64, at Rule 62-204.800, F.A.C., sometime around 2001. CAM may apply to pollutants for which federal standards were promulgated pre-1990 (see the CAM federal regulation, for the complete applicability). CAM does not apply to post-1990 federal standards for certain pollutants.

Specific condition **F.6.** of the Title V air operation permit, permit number 1050004-016-AV effective 01/01/2004, cites a PSD permit modification dated October 8, 2002, which required an oxidation catalyst to be installed on McIntosh Unit 5. Based on the submitted renewal application, this unit now uses an oxidation catalyst to control carbon monoxide (CO) emissions.

The emissions unit section of the renewal application form indicates that McIntosh Unit 5 (emissions unit ID number -028) is not subject to CAM. The permit contains a CO emissions limit of 2 ppmvd when firing natural gas. In the permit renewal application, CO emissions (controlled) were estimated to be 37.2 TPY (natural gas) and 4.8 TPY (oil). The manufacturer information provided in

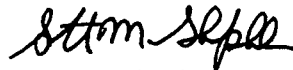
the renewal application indicates a removal efficiency of at least 90% for CO emissions.

Please address specifically, the applicability of CAM to this unit with the oxidation catalyst while firing natural gas and oil. Please provide details as to why CAM is not applicable. As part of the response, include the pre-air pollution control device estimates of CO emissions in tons per year (TPY) and the supporting calculations. If CAM in fact does apply, a CAM Plan will need to be submitted.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. The requested item(s) require a P.E. certification. For any material changes to the application, please include a new certification statement by the responsible official (R.O.).

If you should have any questions, you may contact me by telephone at 850/921-9532 or by e-mail at [Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us).

Sincerely,



Scott M. Sheplak, P.E.  
DEP - Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

copy to: Ms. Farzie Shelton, Lakeland Electric; [farzie.shelton@lakelandelectric.com](mailto:farzie.shelton@lakelandelectric.com)  
Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.; [KKosky@golder.com](mailto:KKosky@golder.com)  
Ms. Cindy Zhang-Torres, P.E., DEP SWD; [Zhang-Torres@dep.state.fl.us](mailto:Zhang-Torres@dep.state.fl.us)

## Livingston, Sylvania

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**From:** Bachand, Timothy [Timothy.Bachand@lakelandelectric.com]  
**Sent:** Thursday, August 07, 2008 2:53 PM  
**To:** Livingston, Sylvania  
**Subject:** RE: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

This document has been received.

Timothy L. Bachand, P.E.  
Manager of Engineering - Production  
863.834.6633 office  
863.838.4229 cell

---

**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, August 06, 2008 1:08 PM  
**To:** Bachand, Timothy  
**Cc:** Shelton, Farzie; KKosky@golder.com; Zhang-Torres@dep.state.fl.us; Walker, Elizabeth (AIR)  
**Subject:** C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Dear Sir/Madam:

**Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).**

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506

<<1050004-023-AV.pdf>>

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

8/13/2008

**Livingston, Sylvia**

---

**From:** Shelton, Farzie [Farzie.Shelton@lakelandelectric.com]  
**Sent:** Wednesday, August 06, 2008 3:14 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Thanks we have received your communication.

*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:** Wednesday, August 06, 2008 1:08 PM  
**To:** Bachand, Timothy  
**Cc:** Shelton, Farzie; KKosky@golder.com; Zhang-Torres@dep.state.fl.us; Walker, Elizabeth (AIR)  
**Subject:** C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

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8/13/2008

**Livingston, Sylvania**

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**From:** Kosky, Ken [Ken\_Kosky@golder.com]  
**Sent:** Wednesday, August 13, 2008 10:13 AM  
**To:** Livingston, Sylvania  
**Cc:** Mohammad, Sal  
**Subject:** RE: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Sylvania: We received the information and have discussed this with Scott. We will be preparing the information. Regards,  
Ken

---

**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, August 13, 2008 9:07 AM  
**To:** Kosky, Ken  
**Subject:** FW: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Mr. Kosky,

I have not received your response to whether you've read this email. Please let me know by replying to this email verifying receipt of the attached document.

Thanks,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506

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**From:** Livingston, Sylvania  
**Sent:** Wednesday, August 06, 2008 1:08 PM  
**To:** 'timothy.bachand@lakelandelectric.com'  
**Cc:** 'farzie.shelton@lakelandelectric.com'; 'KKosky@golder.com'; 'Zhang-Torres@dep.state.fl.us'; Walker, Elizabeth (AIR)

**Subject:** C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

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8/13/2008

## Livingston, Sylvia

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**From:** Zhang-Torres  
**To:** Livingston, Sylvia  
**Sent:** Wednesday, August 06, 2008 4:42 PM  
**Subject:** Read: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Your message

**To:** Zhang-Torres  
**Subject:** FW: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)  
**Sent:** 8/6/2008 1:18 PM

was read on 8/6/2008 4:41 PM.

## Livingston, Sylvia

---

**From:** Sheplak, Scott  
**Sent:** Wednesday, August 06, 2008 1:34 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Thank you.

---

**From:** Livingston, Sylvia  
**Sent:** Wednesday, August 06, 2008 1:21 PM  
**To:** Sheplak, Scott  
**Subject:** FW: C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

Scott,

I inadvertently left your name off of this email so I'm forwarding what I sent.

---

**From:** Livingston, Sylvia  
**Sent:** Wednesday, August 06, 2008 1:08 PM  
**To:** 'timothy.bachand@lakelandelectric.com'  
**Cc:** 'farzie.shelton@lakelandelectric.com'; 'KKosky@golder.com'; 'Zhang-Torres@dep.state.fl.us'; Walker, Elizabeth (AIR)  
**Subject:** C.D. McIntosh, Jr. Power Pant (1050004-023-AV)

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506

<< File: 1050004-023-AV.pdf >>

**Sheplak, Scott**~~file~~

**From:** Zhang-Torres  
**Sent:** Thursday, September 11, 2008 12:47 PM  
**To:** Sheplak, Scott  
**Cc:** Henry, Danielle D.  
**Subject:** RE: Compliance Review of Title V Air Operation Permit Renewal Application

Hi, Scott,

Danielle is out of the office at a training. She will be back tomorrow. I researched the compliance/enforcement history for this facility and found they are under active enforcement due to the following violations:

- (1) submitting Unit 3 Compliance Test and Monitor Certification late;
- (2) not allowing Department staff to take fuel samples at their facility; The facility changed their position later and allowed us to sample their fuel on another day.
- (3) The fuel sampling results indicated their "on-specification" fuel oil had a flash point below the minimum 100 deg. F requirement. This led to a third enforcement referral.
- (4) during an audit of Unit 3 testing conducted on 6/6/08, it was noted that the stack testing ports were not perpendicular to the flow of stack gas.

I hope this helps. Please let me or Danielle know if you need anything else.

Cindy Zhang-Torres

---

**From:** Sheplak, Scott  
**Sent:** Thursday, September 11, 2008 10:54 AM  
**To:** Henry, Danielle D.  
**Cc:** Zhang-Torres  
**Subject:** RE: Compliance Review of Title V Air Operation Permit Renewal Application

I have not heard anything back and plan to issue the draft permit soon. I am going to forward a note I received from the NED Office on this one. Your response is appreciated.

Sincerely,

Scott M. Sheplak

---

**From:** Sheplak, Scott  
**Sent:** Thursday, July 10, 2008 12:06 PM  
**To:** Henry, Danielle D.  
**Cc:** McDonald, Jim  
**Subject:** Compliance Review of Title V Air Operation Permit Renewal Application

{Jim fyi only}

Lakeland Electric - C. D. McIntosh, Jr. Power Plant  
**Project No.:** 1050004-023-AV

On July 3, 2008, our office received the subject application via hard copy.

9/11/2008



Each applicant's Responsible Official (R.O.) for a Title V permit is required to sign a certification of compliance and is also required to report the compliance status of each emissions unit. Any non-compliance at the time of application and/or during the processing of the application requires a compliance plan to be submitted.

The applicant certified compliance in this permit application {see this place in the application: (1) Application Information - R.O. Certification Statement, item 6.}.

Please review this facility's status with your compliance & enforcement staff. Please notify me via email or hard-copy **either**:

- a. there are no outstanding compliance or enforcement actions with this facility; **or**
- b. the following outstanding compliance & enforcement issues exist (please list).

Please review the compliance status of this facility and send us your written comments within 30 days (**no later than August 3<sup>th</sup>**). Thank you for your cooperation.

**Sheplak, Scott**

-f:k-

**From:** Sheplak, Scott  
**Sent:** Thursday, September 11, 2008 10:55 AM  
**To:** Henry, Danielle D.  
**Cc:** Zhang-Torres  
**Subject:** FW: Compliance Review of Title V Air Operation Permit Renewal Application

Here is the note I received from the NED Office on this one.

Sincerely,

Scott M. Sheplak

---

**From:** Banks, Richard  
**Sent:** Friday, July 11, 2008 7:53 AM  
**To:** Sheplak, Scott  
**Cc:** Kirts, Christopher  
**Subject:** RE: Compliance Review of Title V Air Operation Permit Renewal Application

Scott,

There are no outstanding compliance or enforcement actions with City of Gainesville, Gainesville Regional Utilities (GRU) - J.R. Kelly Generating Station.

The Project No. listed is for Lakeland Electric. They apparently have some unresolved significant non-compliance dated 10/02/07.

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**From:** Sheplak, Scott  
**Sent:** Thursday, July 10, 2008 2:50 PM  
**To:** Banks, Richard  
**Subject:** Compliance Review of Title V Air Operation Permit Renewal Application

City of Gainesville, Gainesville Regional Utilities (GRU) - J.R. Kelly Generating Station  
**Project No.** 1050004-023-AV

On July 1, 2008, our office received the subject application via hard copy.

Each applicant's Responsible Official (R.O.) for a Title V permit is required to sign a certification of compliance and is also required to report the compliance status of each emissions unit. Any non-compliance at the time of application and/or during the processing of the application requires a compliance plan to be submitted.

The applicant certified compliance in this permit application {see these two places in the application: (1) Application Information - R.O. Certification Statement, item 6.; and (2) Additional Requirements for Title V Air Operation Permit Applications - Compliance Report and Plan, item 3.}.

Please review this facility's status with your compliance & enforcement staff. Please notify me via email or hard-copy **either:**

- a. there are no outstanding compliance or enforcement actions with this facility; **or**
- b. the following outstanding compliance & enforcement issues exist (please list).

Please review the compliance status of this facility and send us your written comments within 30 days (**no later than August 1<sup>st</sup>**). Thank you for your cooperation.

9/11/2008

**Sheplak, Scott**

-file-

---

**From:** Holtom, Jonathan  
**Sent:** Tuesday, September 23, 2008 8:41 AM  
**To:** Sheplak, Scott  
**Subject:** RE: Draft Permit No. 1050004-023-AV

That makes things easier. Go ahead and draft JEA while you are waiting for their response. I'll have minor comments for you on GRU this morning, but overall, it looks good. Thanks!

Jon

---

**From:** Sheplak, Scott  
**Sent:** Monday, September 22, 2008 4:30 PM  
**To:** Holtom, Jonathan  
**Subject:** Draft Permit No. 1050004-023-AV

City of Lakeland Electric  
C. D. McIntosh, Jr. Power Plant

The compliance items referred for enforcement action will be released in a Warning Letter. The items do not require a Compliance Plan to be added into the Title V permit renewal I am working on. The consultant is working on a response to the CAM question I had.



Farzie Shelton, ChE; REM

Associate GM Technical Support

**CERTIFIED MAIL**

October 28, 2008

Mr. Jonathan Holtom, P.E.  
Acting Title V Program Administrator  
Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED

OCT 30 2008

BUREAU OF AIR REGULATION

Attention: Mr. Scott M. Sheplak, P.E.

**RE: Title V Permit Renewal Application RAI #1 Response  
C.D. McIntosh, Jr. Power Plant Permit Application No.: 1050004-023-AV**

Dear Mr. Sheplak:

We are in receipt of your letter dated August 6, 2008 requesting further information in regards to a possible CAM plan requirement for Unit 5 (EU 028) at the C.D. McIntosh, Jr. Power Plant for purposes of permit renewal. Lakeland Electric does not believe Unit 5 is required to obtain a CAM plan under 40 CFR 64, referenced in Rule 62-204.800, F.A.C., for reasons cited in the attached response by Mr. Ken Kosky of Golder Associates, Inc. Enclosed please find four (4) copies of this response signed by Mr. Ken Kosky, P.E. and Mr. Salahuddin Mohammad of Golder Associates and a certification by Mr. Timothy Bachand our Responsible Official.

In conclusion, as always, Lakeland greatly values all the help and cooperation you and the Department have extended to us in our permitting efforts. Please feel free to contact me, if you should have any further questions.

Sincerely,

for Farzie Shelton

Enclosures

4 copies of response from Golder to RAI #1 & RO Certification

cc: Ms. Danielle Henry (FDEP SWD) – 1 copy of cover letter/certification and response (certified mail)  
Mr. Ken Kosky & Mr. Salahuddin Mohammad (Golder) – 1 copy of cover letter/certification (e-mail)  
Mr. Tim Bachand (LE) – 1 copy of cover letter (e-mail)

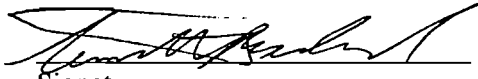
**City of Lakeland • Department of Electric Utilities**

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Cell 863.430.8297

[farzie.shelton@lakelandelectric.com](mailto:farzie.shelton@lakelandelectric.com)

Page 1 of 1

**Responsible Official Certification**

1. Responsible Official Name : <b>Timothy Bachand, P.E., Manager of Engineering</b>
2. Responsible Official Mailing Address...  Organization/Firm: <b>Lakeland Electric</b> Street Address: <b>501 E. Lemon St.</b> City: <b>Lakeland</b> State: <b>FL</b> Zip Code: <b>33801-5079</b>
3. Owner/Authorized Representative Telephone Numbers...  Telephone: <b>(863) 834-6633</b> ext. Fax: <b>(863) 834-5670</b>
4. Responsible Official Email Address: <b>TIMOTHY.BACHAND@LAKELANDELECTRIC.COM</b>
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>  <b>Item(s) Certified: <u>Title V Permit Renewal Application RAI #1 Response</u></b>   Signature  10/27/08 Date

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL 32653-1500  
Telephone (352) 336-5600  
Fax (352) 336-6603



October 22, 2008

063-7630

Florida Department of Environmental Protection  
Title V Section  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Environmental Affairs**

**RECEIVED**  
**OCT 27 2008**

Attention: Mr. Scott M. Sheplak, P.E.

**RE: C. D. McINTOSH, JR. POWER PLANT  
PROJECT NO. 1050004-023-AV  
TITLE V AIR OPERATING PERMIT RENEWAL APPLICATION  
REQUEST FOR ADDITIONAL INFORMATION**

Dear Mr. Sheplak:

Lakeland Electric has received the Florida Department of Environmental Protection's (FDEP) request for additional information (RAI) dated August 6, 2008, regarding the Title V air operating permit renewal application for the C. D. McIntosh, Jr. power plant. The one request is presented below along with the response:

**Comment 1. New Applicable Requirements – Compliance Assurance Monitoring (CAM). The U.S. EPA promulgated and State of Florida adopted the CAM federal regulation, 40 CFR 64, at Rule 62-204.800, F.A.C., sometime around 2001. CAM may apply to pollutants for which federal standards were promulgated pre 1990 (see the CAM federal regulation, for the complete applicability). CAM does not apply to post-1990 federal standards for certain pollutants.**

Specific condition F.6. of the Title V air operating permit, permit number 1050004-016-AV effective 01/01/2004, cites a PSD permit modification dated October 8, 2002, which required an oxidation catalyst to be installed on McIntosh Unit 5. Based on the submitted renewal application, this unit now uses an oxidation catalyst to control carbon monoxide (CO) emissions.

The emissions unit section of the renewal application form indicates that McIntosh Unit 5 (emissions unit ID number -028) is not subject to CAM. The permit contains a CO emissions limit of 2 ppmvd when firing natural gas. In the permit renewal application, CO emissions (controlled) were estimated to be 37.2 TPY (natural gas) and 4.8 TPY (oil). The manufacturer information provided in the renewal application indicates a removal efficiency of at least 90% for CO emissions.

Please address specifically, the applicability of CAM to this unit with the oxidation catalyst while firing natural gas and oil. Please provide details as to why CAM is not applicable. As part of the response, include the pre-air pollution control device estimates of CO emissions in tons per year (TPY) and the supporting calculations. If CAM in fact does apply, a CAM Plan will need to be submitted.

**Response:** It is our understanding that CAM does not apply to McIntosh Unit 5.

Specific Condition F.6. of Title V permit No. 1050004-016-AV required installation of an oxidation catalyst system for Unit 5 and the system was installed in 2003. However, there is no emissions limitation for CO. Specific Condition F.10. states that "After July 31, 2003, the concentration of CO in the exhaust

gas shall be additionally controlled by the use of an oxidation catalyst with a minimum of 90 percent CO removal efficiency (based upon design at base load)."

Specific Condition F.8 provides a summary of the BACT determination. As shown for CO, the BACT determination is an "Oxidation Catalyst (annual test 2 ppm criteria at full load firing natural gas)." This condition clearly states that the BACT is an oxidation catalyst and the 2 ppm is a criteria (emphasis added) and not an emission limit as indicated for NO<sub>x</sub>.

The 2 ppmvd CO concentration mentioned in Specific Condition F.10. is a criteria (emphasis added) to demonstrate the efficiency of the oxidation catalyst system as the Specific Condition F.10. further states that "The CO emissions shall be tested annually at full load and shall not exceed 2 ppmvd when firing natural gas as measured by EPA Method 10. The oxidation catalyst shall be maintained according to manufacturer's recommendations; however, in the event that CO emissions exceed 2 ppmvd (as demonstrated by annual testing above) the permittee shall implement a remedy and re-test within 90 days of operation. Should the re-test result in CO emissions exceeding 2 ppmvd, the remedy shall be to completely replace the oxidation catalysts." This condition sets forth requirements that clearly indicate that the 2 ppm is not an emission limit. This condition specifically allows an interim period of 90 days to insure that the criteria of 2 ppm can be met. Indeed, the condition specifically allows 2 ppm to be exceeded as long as actions are taken per the condition. In contrast, an emission limit established under the Department's rules would not have such leeway with possible enforcement if the emission limit was not achieved.

According to 40 CFR 64.2(a)(1), CAM applies to an emission unit if the unit is subject to an emission limitation or standard for the applicable regulated air pollutant. Therefore, since McIntosh Unit 5 is not subject to a CO emissions limitation, CAM for CO does not apply.

The oxidation catalyst system for McIntosh Unit No. 5 was installed in 2003 and CO test data is available from the period before the system was installed. Emissions test data summaries from 2001 (test date 3/2/00) and 2001 (test date 7/17/01) are attached. As shown in the test data, uncontrolled CO concentration from McIntosh Unit 5 is less than 2 ppmvd corrected at 15-percent oxygen and the maximum uncontrolled CO emissions is 7.0 lb/hr, which is equivalent to 30.7 TPY assuming 8,760 hours/year operation. According to 40 CFR 64.2(a)(3), CAM applies to an emission unit if the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in TPY, required for a source to be classified as a major source. The major source threshold for CO is 100 TPY for the C.D. McIntosh facility and McIntosh Unit 5's uncontrolled CO emissions is less than 100 TPY, CAM does not apply.

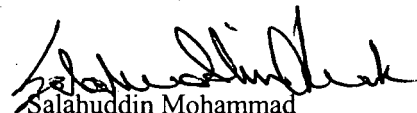
Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

**GOLDER ASSOCIATES INC.**



Kennard F. Kosky, P.E.  
Principal Engineer



Salahuddin Mohammad  
Senior Engineer

SKM/KFK/sl

Enclosures

cc: F. Shelton, Lakeland Electric

RA1102208\_630.doc

**Table 7. Summary of Emission Test Results, Base Load**

Run No.	1	2	3	Average
Date	17-Jul-01	17-Jul-01	17-Jul-01	
Time	1432-1504 1546-1618	1644-1746	1809-1913	
Condition	Base	Base	Base	
Load, MW	242	242	241	242
Fuel Rate, kpph	102.36	102.34	102.27	102.32
LHV, mmBtu/lb	0.02071	0.02071	0.02071	0.02071
Net Heat Rate, mmBtu/hr	2119.8	2119.4	2117.9	2119.01
HHV, mmBtu/lb	0.02294	0.02294	0.02294	0.02294
Gross Heat Rate, mmBtu/hr	2348.1	2347.7	2346.1	2347.3
F-Factor	8710	8710	8710	8710
Combustor Inlet Pressure, psig	268	270	269	269
NOx Factor	1.194E-07	1.194E-07	1.194E-07	1.194E-07
CO Factor	7.260E-08	7.260E-08	7.260E-08	7.260E-08
UHC Factor	4.151E-08	4.151E-08	4.151E-08	4.151E-08
Ambient Temperature, deg F	76.7	74.7	75.0	75.5
Barometric Pressure, in Hg	29.91	29.90	29.90	29.90
Relative Humidity, %	95.3	96.5	98.3	96.7
Humidity, lb water/lb dry air	0.0190	0.0178	0.0186	0.0185
Stack Moisture, vol %	8.00	8.00	8.00	8.00
O2 Conc., vol %	12.91	12.94	12.91	12.92
CO2 Conc., vol %	4.46	4.43	4.44	4.44
NOx Conc., ppmvd	28.6	28.5	28.1	28.4
corr. NOx, ppmvd @ 15% O2	21.1	21.1	20.7	21.0
NOx Emission Factor, lb/mmBtu	0.07780	0.07782	0.07644	0.07735
NOx Mass Rate, lb/hr as NO <sub>2</sub>	182.7	182.7	179.3	181.6
NOx Mass Rate, ISO day, lb/hr as NO <sub>2</sub>	220.8	217.1	216.2	218.1
CO Conc., ppmvd	0.8	0.9	0.9	0.9
corr. CO, ppmvd @ 15% O2	0.6	0.7	0.7	0.6
CO Emission Factor, lb/mmBtu	0.00132	0.00149	0.00149	0.00144
CO Mass Rate, lb/hr	3.1	3.5	3.5	3.4
CO Mass Rate, ISO day, lb/hr	3.9	4.3	4.4	4.2
UHC Conc., ppmww	0.0	0.1	0.0	0.0
UHC Conc., ppmvd	0.0	0.1	0.0	0.0
UHC Emission Factor, lb/mmBtu	0.00000	0.00010	0.00000	0.00003
UHC Mass Rate, lb/hr	0.00	0.24	0.00	0.08
UHC Mass Rate, lb/hr, ISO day	0.00	0.30	0.00	0.10



Table 1.2: Summary of Emissions Test Results Lakeland Utilities GT Unit #5  
Natural Gas Firing - Base Load

Date: 02 March 2000

Parameter	Units	Base Load	Emiss Limit
<b>Operating Parameters</b>			
Load	MW	238.2	
Load (%)	(%)	100.0	
Fuel Flow	kgph	103.2	
Lower Heating Value	Btu/lb	21034.0	
Heat Input (LHV)	MMBtu/hr	2171.1	2174 @ ISO
Volumetric Flow (Method 19 based)	dsd/m	891459.4	(c)
<b>Ambient Data</b>			
Ambient Temperature	degrees F	80.11	
Barometric Pressure	"Hg	29.82	
Specific Humidity (Hobs)	# H <sub>2</sub> O/lb DA	0.01006	
<b>Emissions Data</b>			
Oxygen	%V dry	12.7	
Nitrogen Oxides	ppmV dry	31.4	
	lb/MMBtu	0.0832	
	ppmV@15% O <sub>2</sub>	22.6	25 (a)
	ppmV@15% O <sub>2</sub> & ISO Conditions lb/hr (c)	22.8 200.3	117.4 (b) 237 (a)
Carbon Monoxide	ppmV dry	1.8	
	lb/MMBtu	0.0029	
	ppmV@15% O <sub>2</sub>	1.3	25 (a)
	lb/hr (c)	7.0	145 (a)
Volatile Organic Compounds (VOC) (as carbon)	ppmC,w	0.0	4
	lb/MMBtu	0.0000	
	lb/hr (c)	0.0	
Visible Emissions	% Opacity	0.0	10

**Notes:**

Combustion Turbine Model: SWPC 501G - Simple Cycle

Fuel Factor (Fd) = 8710scf@90%O<sub>2</sub>/MMBtu from 40CFR60 Appendix A, Method 19

Y = 9.197 Kilopounds/Wait-Hour (8725 Btu/kwh) for Natural Gas for NSPS limit calculation

The first base load test was split between three periods with calibration checks between (14:12-14:36, 14:56-15:20, 15:35-15:51)

(a) - BACT/FDEP Permit Emissions Limit (value at 15% O<sub>2</sub> is for base load only) - lb/hr applies at all load conditions

(b) - 40CFR60, Subpart GG - NSPS Emissions Limit. Note that the ratio of standard pressure to observed ambient pressure was used in the ISO correction since curves of combustor inlet pressure vs. unit load are not available for this type of unit. This ratio is known to closely track the ratio of reference combustor inlet pressure to observed combustor inlet pressure for combustion turbines.

(c) - Mass Emission Rates Calculated using the Volumetric Flowrate determined from the Method 19 approach.

(d) - Heat Input during the Base Load test was between 95% and 105% of the permitted rate.



-file-  
Farzie Shelton, ChE; REM

Associate GM Technical Support

RECEIVED

DEC 01 2008

BUREAU OF AIR REGULATION

CERTIFIED MAIL – RECEIPT REQUESTED

November 24, 2008

Mr. Bruce Thomas, P.E.  
Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: C.D. McIntosh, Jr. Power Plant – Draft/Proposed Permit No. 1050004-023-AV  
Lakeland Electric – Public Notice of Intent to Issue Title V Air Operation Permit**

Dear Mr. Thomas:

We are in receipt of the draft/proposed Title V Operation Permit Renewal for the C.D. McIntosh, Jr. Power Plant. Accordingly on November 22, 2008 we published the Public Notice of Intent in the Lakeland Ledger. Therefore, enclosed you will find the affidavit of publication as required under provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

For Farzie Shelton

Enclosure: Affidavit of Publication in the Lakeland Ledger

cc: Mr. Timothy Bachand, P.E. (LE) w/o enc. via email  
Mr. Ken Kosky, P.E. & Mr. Salahuddin Mohammad (Golder Assoc.) w/o enc. via email  
Ms. Danielle Henry (FDEP SWD) – 1 copy of cover letter and affidavit (certified mail)

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Cell 863.430.8297

[farzie.shelton@lakelandelectric.com](mailto:farzie.shelton@lakelandelectric.com)

Page 1 of 1

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No's:

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Paula Freeman, who on oath says that she is Inside Sales Classified Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Public Notice of Intent

In the matter of Permit #1050004-023-AV

concerning C.D. McIntosh, Jr., Power Plant- Polk County, Florida

was published in said newspaper in the issues of 11-22; 2008

Affiant further says that said The Ledger is a newspaper published at Lakeland, Is said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed: Paula Freeman
Paula Freeman
Inside Sales Classified Manager
Who is personally known to me.

Sworn to and subscribed before me this 24TH day of NOVEMBER A.D. 20 08

Notary Public Patricia Ann Rouse (Seal)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V... Florida Department of Environment... Draft/Proposed Permit No. 10500... City of Lakeland, Department of Electric Utility... C. D. McIntosh, Jr. Power Plant- Polk County, Florida... Applicant: The applicant for this project is the City of Lakeland... Facility Location: The applicant operates the existing C... Project: The applicant applied on July 3, 2008 to the Department... Permitting Authority: Applications for Title V air operation... Project File: A complete project file is available for public... Comments: The Permitting Authority will accept written... Petitions: A person whose substantial interests are affected...

Re: Title V Air Operation Permit Renewal, Project No. 105004-023-AV  
McIntosh Power Plant

1. What does "UPS" stand for in the unregulated emission units, E.U. ID Nos. -009 & -010?  
*don't know for sure, so kept.*
2. Unit 3 (E.U. ID No. -006). Has SCR been installed on Unit 3? The specific condition 5. from Permit No. 1050004-018-AC (see below) has a provision to reassess the CO limit for BACT when SCR is installed.

"5. Carbon Monoxide (CO):

- a. Emissions of CO shall not exceed 0.20 lb/mmBtu heat input on a 30-operating day rolling average as demonstrated by the required CEMS. This CO emission limit may be adjusted downward to make this limit more stringent based on the Department's reassessment of BACT during the subsequent phase of this project involving *installation of selective catalytic reduction.*
- b. Emissions of CO shall not exceed 0.20 lb/mmBtu on a 3-hr average during the initial compliance demonstration.

[62-210.200 (BACT), and 62-212.400(PSD), F.A.C.]"

*not yet done, so kept.*

3. Unit 5 (E.U. ID No. -028). Has conventional SCR been installed on Unit 5? {This affects specific condition **F.9.** of Permit No. 1050004-016-AV}.

*Yes.*

4. Unit 5 (E.U. ID No. -028). Has EPA approved the natural gas custom fuel monitoring schedule of specific condition **F.20.** from Permit No. 1050004-016-AV? Do the recent revisions to the NSPS 40 CFR 60 Subpart GG now allow this?

*NSPS GG provides.*

5. Unit 5 (E.U. ID No. -028). Has EPA approved the use of the NOS CEMS in lieu of the water to fuel ratio of specific condition **F.40.** from Permit No. 1050004-016-AV? Do the recent revisions to the NSPS 40 CFR 60 Subpart GG now allow this?

*See 4.*

Scott

11/13

**Sheplak, Scott**

---

**From:** Sheplak, Scott  
**Sent:** Thursday, November 06, 2008 5:06 PM  
**To:** 'Shelton, Farzie'  
**Subject:** McIntosh - Title V air operation permit renewal  
**Attachments:** follow ups for 1050004-023-AV pre-draft.doc

I am drafting the Title V air operation permit renewal, Project No. 105004-023-AV, for the McIntosh Power Plant and have a few questions (attached) if someone can help me out. Some items were not clear in the last renewal Permit No. 105004-016-AV, the recent permit revision Permit No. 1050004-020-AV, or the subject renewal application.

You can reply to me by e-mail or telephone.

Sincerely,

Scott M. Sheplak  
DEP - Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

Telephone 850/921-9532  
Fax 850/921-9533

**Sheplak, Scott***-file-*

---

**From:** Sheplak, Scott  
**Sent:** Monday, December 01, 2008 2:37 PM  
**To:** 'Forney.Kathleen@epamail.epa.gov'; 'Oquendo.Ana@epamail.epa.gov'  
**Cc:** Friday, Barbara; Holtom, Jonathan  
**Subject:** CITY OF LAKELAND ELECTRIC - C.D. MCINTOSH, JR. POWER PLANT; 1050004-023-AV

<b>Tracking:</b>	<b>Recipient</b>	<b>Read</b>
	'Forney.Kathleen@epamail.epa.gov'	
	'Oquendo.Ana@epamail.epa.gov'	
	Friday, Barbara	Read: 12/1/2008 2:37 PM
	Holtom, Jonathan	

Title V Air Operation Permit Renewal  
Parallel Review - Draft/Proposed Permit

The purpose of this e-mail is to notify the United States Environmental Protection Agency (USEPA) Region 4 of the beginning and end dates of the public comment period for the subject permit.

The Public Notice for the subject permit was published on **November 22, 2008**. Proof of publication of the Public Notice was received on **December 1, 2008**.

12/1/2008



RECEIVED

DEC 12 2008

BUREAU OF AIR REGULATION

**CERTIFIED MAIL**

December 10, 2008

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: Lakeland Electric Comments to Draft/Proposed Permit No. 1050004-023-AV**

Dear Mr. Sheplak:

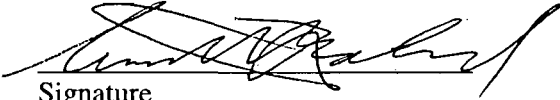
Please find attached to this cover letter Lakeland Electric's Responsible Official Certification in regards to the previously submitted comment letter covering draft/proposed Permit No. 1050004-023-AV. I have also attached a copy of the original correspondence that was sent via e-mail. If you should have any questions regarding the enclosed please do not hesitate to contact me.

Sincerely,

Bret Galbraith, E.I.  
Lakeland Electric  
(863) 834-8180  
*Bret.Galbraith@lakelandelectric.com*

Enclosures: RO page (T. Bachand); permit renewal comments; e-mail verification of original submittal

**Responsible Official Certification**

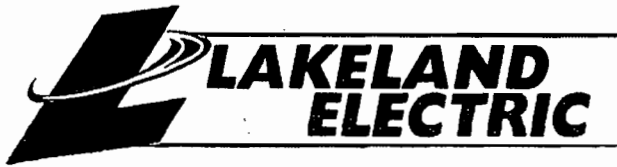
1. Responsible Official Name : <b>Timothy Bachand, P.E., Manager of Engineering</b>
2. Responsible Official Mailing Address...  Organization/Firm: <b>Lakeland Electric</b> Street Address: <b>501 E. Lemon St.</b> City: <b>Lakeland</b> State: <b>FL</b> Zip Code: <b>33801-5079</b>
3. Owner/Authorized Representative Telephone Numbers...  Telephone: <b>(863) 834-6633</b> ext. Fax: <b>(863) 834-5670</b>
4. Responsible Official Email Address: <b>TIMOTHY.BACHAND@LAKELANDELECTRIC.COM</b>
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>  <b>Item(s) Certified: <u>Lakeland Electric Comments to Draft/Proposed Permit No. 1050004-023-AV</u></b>   Signature  12/9/08 Date

**RECEIVED**

**DEC 12 2008**

**BUREAU OF AIR REGULATION**





Farzie Shelton, ChE; REM

Associate GM Technical Support

RECEIVED

DEC 12 2008

BUREAU OF AIR REGULATION

SENT VIA E-MAIL

Scott.sheplak@dep.state.fl.us

December 5, 2008

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: Lakeland Electric Comments to Draft/Proposed Permit No. 1050004-023-AV**

Dear Mr. Sheplak:

After review of the Draft/Proposed Permit No. 1050004-023-AV, Lakeland Electric has the following comments.

- 1) On page #2 Subsection A:
  - a. The facility description should state that Unit 1 (EU 001) is, in addition to the oil and gas, permitted to fire on-specification used oil and that Unit 2 (EU 005) is permitted to fire #2 fuel oil other than just as an for ignition purposes. Therefore, this section should be corrected to reflect all the fuels that these units are permitted to utilize and be consistent with other unit descriptions discussed in the other sections of this permit
- 2) On page #3:
  - a. The reference to EU 005 should be corrected to read EU 006 as Unit 3 is the only Acid Rain, Phase II NOx unit at McIntosh Power Plant.
- 3) Page #11 Specific Condition A.29.e.(2)(c):
  - a. Lakeland is requesting that the requirements from testing on-specification used oil for only sulfur, density, and heat content of each used oil batch be changed to testing oil from Lakeland Electric's used oil tank for density and heat content once monthly if there is any addition of on-specification used oil to the tank during that month. However, other testing parameters i.e. for metals, halogens, PCB, and flash point will be conducted on each batch. Lakeland Electric feels that this change in testing methodology will allow for a better estimate of the parameters of the on-specification used oil that would be burned while this action does not result in a lessening of Lakeland Electric's compliance requirements. Lakeland Electric also feels that the testing requirement of the on-specification used oil for sulfur is moot and should be deleted because Unit No. 1 is permitted to burn #6 fuel oil containing 2.5% by weight sulfur and our on-specification used oil is mainly generated from maintenance activities on equipment such as transformers and at no time the transformer oil would contain any appreciable amount of

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Cell 863.430.8297

farzie.shelton@lakelandelectric.com

Page 1 of 2

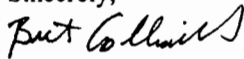
sulfur, let alone 2.5% by weight. Because of these facts, Lakeland Electric believes that any sulfur analysis requirement for on-specification used oil should be removed from the permit.

4) Page #24 Brief Description:

- a. On line six (6) under the *Brief Description* is a typo mistake the acronym "FDG" is to be changed to *FGD*.

As per requirements, Lakeland is sending a hardcopy Responsible Official Certification regarding this submittal and the Department should receive it shortly. As always, Lakeland Electric appreciates all the cooperation you and your staff have given us in this permit renewal. If you should have any questions regarding these comments please do not hesitate to contact us.

Sincerely,



For Farzie Shelton

City of Lakeland • Department of Electric Utilities

---

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Cell 863.430.8297

[farzie.shelton@lakelandelectric.com](mailto:farzie.shelton@lakelandelectric.com)

Page 2 of 2

**Galbraith, Bret**

---

**From:** Galbraith, Bret  
**Sent:** Friday, December 05, 2008 3:42 PM  
**To:** 'Sheplak, Scott'  
**Subject:** RE: C.D. McIntosh Jr. 1050004-023-AV Draft/Proposed Permit Comments  
**Attachments:** McIntosh Renewal Response.Doc

Mr. Sheplak:

Attached is a Microsoft Word version of the previously submitted comments. Thank you again.

**Bret Galbraith, E.I.**

Environmental Permitting

Lakeland Electric

501 E. Lemon St.

Lakeland, FL 33801

Mail Code: LE-ENVIR

office: (863) 834-8180

cell: (813) 351-0149

fax: (863) 834-8187

[Bret.Galbraith@lakelandelectric.com](mailto:Bret.Galbraith@lakelandelectric.com)

---

**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]  
**Sent:** Friday, December 05, 2008 3:37 PM  
**To:** Galbraith, Bret  
**Subject:** RE: C.D. McIntosh Jr. 1050004-023-AV Draft/Proposed Permit Comments

Could you send a Microsoft Word version? I will be restating each comment along with a response. Thank you and have a good weekend!

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

**From:** Galbraith, Bret [mailto:Bret.Galbraith@lakelandelectric.com]  
**Sent:** Friday, December 05, 2008 3:33 PM  
**To:** Sheplak, Scott  
**Cc:** Shelton, Farzie  
**Subject:** RE: C.D. McIntosh Jr. 1050004-023-AV Draft/Proposed Permit Comments

Mr. Sheplak:

Attached are Lakeland Electric's comments for Draft/Proposed Permit No. 1050004-023-AV. A hardcopy with Lakeland Electric's signed Responsible Official Certification Page regarding this submittal is being sent and should reach the Department shortly. Please contact me if you have any questions. Thank you.

12/10/2008

**Bret Galbraith, E.I.**

Environmental Permitting

Lakeland Electric

501 E. Lemon St.

Lakeland, FL 33801

Mail Code: LE-ENVIR

office: (863) 834-8180

cell: (813) 351-0149

fax: (863) 834-8187

[Bret.Galbraith@lakelandelectric.com](mailto:Bret.Galbraith@lakelandelectric.com)

**Sheplak, Scott**~~file~~

**From:** Sheplak, Scott  
**Sent:** Monday, December 29, 2008 1:23 PM  
**To:** Kahn, Joseph  
**Cc:** Fillingim, Mary; Arif, Syed; Holtom, Jonathan  
**Subject:** RE: CITY OF LAKELAND ELECTRIC - C.D. MCINTOSH, JR. POWER PLANT; 1050004-023-AV

Good catches. I changed the font sizes on those two pages and deleted the comma. The pages will be replaced.

The sentence on heat input excluding the acid rain CEMS is probably in all of the other solid fuel fired boiler Title V permits. The industry had been very concerned about the acid rain CEMS overestimating heat input if I recall their claim correctly. The Title V permits may have this in the form of a sentence or within the actual permitting note. {Note, the majority of the coal fired units will be coming in the next wave in 2009.}

---

**From:** Kahn, Joseph  
**Sent:** Monday, December 29, 2008 12:36 PM  
**To:** Sheplak, Scott  
**Cc:** Fillingim, Mary; Arif, Syed; Holtom, Jonathan  
**Subject:** RE: CITY OF LAKELAND ELECTRIC - C.D. MCINTOSH, JR. POWER PLANT; 1050004-023-AV

Scott,

Looks good. I have a couple of comments.

One minor thing is that I noticed that the format of the font in the headers of the EU description tables on page 24 for EU 006 and page 32 for EU 028 don't match the other similar tables. To match, the font needs to be changed from 12 pt bold underlined to 11 pt bold.

I'm curious about the sentence excluding the acid rain CEMS as the means of compliance demonstration for the heat input limit on EU 006 (condition E.1). Seems like that might be the only way to accurately determine heat input, given the various solid fuels this unit can fire. I guess with the permitting note, my point is irrelevant, but I was wondering if the applicant had proposed some other way to measure heat input, even during testing.

Also, I'm curious if the exclusion sentence of E.1 extends to demonstrating compliance with the limits of E.3 (c, d, and f). I'm presuming it doesn't, but could be cause for future confusion with the compliance authority. At this point, I'm suggesting that we will need to definitively settle the issue of how (and when) to measure heat input for solid fuels in future permits, rather than make a change to this permit right now. (Let's add this issue to Jonathan's "to do" list.)

In condition E.9, you'll need to delete this comma: "...(65 percent reduction), when..." If I'm reading this condition correctly, that comma is going to cause confusion later.

Thanks for being the first to send me the files electronically. It was easy for me to review it that way.

Joe

---

**From:** Sheplak, Scott

1/8/2009

**Sent:** Monday, December 29, 2008 11:51 AM

**To:** Kahn, Joseph

**Cc:** Fillingim, Mary; Arif, Syed; Holtom, Jonathan

**Subject:** CITY OF LAKELAND ELECTRIC - C.D. MCINTOSH, JR. POWER PLANT; 1050004-023-AV

Mr. Joe Kahn:

Here is an electronic version of what is coming your way for review & signature. The referenced Appendices and Attachments are not included herein.

Happy New Year!

Sincerely,

*Scott M. Sheplak*

Scott M. Sheplak

DEP - Title V Section

Mail Station #5505

2600 Blair Stone Road

Tallahassee, FL 32399

Telephone 850/921-9532