



Farzie Shelton, chE; REM

Environmental Affairs Manager of Licensing & Permitting

August 17, 2000

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Mr. Scott M. Sheplak, P.E., Administrator
Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

BUREAU OF AIR REGULATION

RE: C.D. McIntosh, Jr. Power Plant
DEP Permit Revision No. 1050004-009-AV; Facility ID No.: 1050004
Comments

Dear Scott:

Presented below are some comments to the Title V Permit Revision for the C. D. McIntosh, Jr. Power Plant.

Specific Conditions III., A.1. and 1.1.: It is requested that the Department consider changing the term "maximum" as related to heat input to "nominal". This would make the wording consistent with the permitting note in these conditions and eliminate confusion.

Specific Condition III., E.1.: It is requested that the permitting note be updated with language the Department has used in previous Title V permits to clarify not using the Acid Rain CEM for determining heat input. The following paragraph, added at the end of the permitting note, would clarify the condition:

"Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or owner or operator, to calculate average hourly heat input during the test."}

Section III. Subsection F. Brief Description: The last sentence of the first paragraph referring to the combined cycle unit and the potential requirement for review and BACT should be deleted. The original PSD permit for this facility (PSD-FL-245) contained

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provisions for combined cycle unit. The City submitted applications as required pursuant to 403.500 F.S. and Chapter 62-17 to obtain approval of the combined cycle unit with the air emissions consistent with the PSD permit. The Siting Board approved the combined cycle unit in April 2000. The construction of this unit is underway. When performance tests are completed, the City will request a revision to the Title V Permit to include the requirements for the combined cycle unit consistent with the PSD permit.

If you have any questions or need any further information to complete your review, please call me at 863-834-6603. Your assistance is always appreciated.

Sincerely,



Farzie Shelton, ChE
Manager of Environmental Licensing and Permitting

cc: Ronald Tomlin, Lakeland Electric
Ken Kosky, Golder

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