

June 7, 1995

**Farzie Shelton**  
ENVIRONMENTAL COORDINATOR, Ch E.

VIA HAND DELIVERY

Howard L. Rhodes, Director  
Division of Air Resources Management  
Florida Department of Environmental Protection  
Magnolia Park Courtyard  
Tallahassee, FL 32301

RECEIVED

JUN 9 1995

Bureau of  
Air Regulation

RE: City of Lakeland; C.D. McIntosh Unit No. 3  
Requests to Revise PSD Permit (PSD-FL-8) and  
Modify Site Certification (PA-78-06)

Dear Howard:

The City of Lakeland would like to thank you again for meeting with us at the C.D. McIntosh Power Plant on May 2 and for meeting with us at your offices on April 21 to discuss the City's request to revise its Prevention of Significant Deterioration Permit for Unit No. 3. In response to the Department's request, the City submitted additional information on May 17, 1995, which we hope will provide the Department with sufficient data to complete its review and issue the requested revision. Subsequently, the City received a letter dated May 18, 1995, from Al Linero attaching two memoranda describing a coal-fired unit in Illinois which was permitted by the U.S. Environmental Protection Agency (EPA) at the same time as the McIntosh Unit No. 3 was being permitted by EPA.

We appreciate the Department directing our attention to these memoranda. The November 1978 memorandum from EPA Headquarters clarifies that while "Best Available Control Technology" determinations may require more control than an old New Source Performance Standard (NSPS), each determination is made on a case-by-case basis. EPA may presume that a new source will be able to comply with proposed NSPS standards but that presumption may be rebutted and, again, each determination is case-by-case. The unit described in the memoranda is similar to the McIntosh Unit No. 3, only larger (650 MW compared to 364 MW). It is very interesting to note that the PSD permit issued in August of 1979 for the Illinois unit (eight months *after* the McIntosh permit was issued) provides for a sulfur dioxide limit of 0.96 lb/mmBtu<sup>1</sup> based on a thirty-day rolling average, with *no requirement to install a scrubber*. (A copy of the PSD permit and final determination are enclosed for your information.) Since

<sup>1</sup> It is our understanding that this limit was accepted at least in part because of ambient air quality standard concerns. In fact, annual limits were eventually accepted because of ambient air quality concerns.

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no scrubber or sulfur dioxide removal device was required, no corresponding sulfur dioxide removal efficiency was required. EPA's final BACT determination for that unit recognizes that standards under NSPS Subpart Da had been *proposed* but did *not* require compliance with the proposed standards. Instead, EPA issued an independent BACT determination, finding that an emission limit of 0.96 lb/mmBtu based on a 30-day rolling average was sufficient for BACT, without the need for a scrubber or sulfur dioxide removal efficiencies (as *proposed* under NSPS Subpart Da). The *proposed* NSPS Subpart Da standards were more stringent than the *final* standards, requiring scrubbing with a minimum 85 percent sulfur dioxide removal efficiency unless emissions were below 0.20 lb/mmBtu.

As you may recall, the sulfur dioxide limit being proposed by the City of Lakeland for the McIntosh Unit No. 3 is 0.90 lb/mmBtu based on a thirty-day rolling average. In addition, Lakeland is proposing to operate its scrubber at all times, with a minimum overall sulfur dioxide removal efficiency of 85 percent whenever high sulfur coal is burned and 60 percent whenever sulfur dioxide emissions are 0.90 lb/mmBtu or less (also based on a thirty-day rolling average). Because the EPA-issued permit for the Illinois unit was issued subsequent to the McIntosh Unit No. 3 permit and contains a less stringent emission limit than what has been proposed by the City, it seems reasonable for the Department to revise Unit No. 3's permit as requested. Not only is the emission limit proposed by the City lower than the limit in the EPA-issued permit for the Illinois unit (0.90 vs. 0.96 lb/mmBtu), the City has proposed to operate its sulfur dioxide scrubber with 85 and 60 percent overall removal efficiencies.

In other words, if the "Best Available Control Technology" was determined by EPA to be 0.96 lb/mmBtu, thirty-day rolling average, with no scrubbing in August of 1979, it would certainly be reasonable for a BACT determination for a December 1978 permit to be at least as stringent. The City's proposal would, in fact, be *more* stringent than the August 1979 BACT determination for the Illinois unit. We hope that you consider this when deciding whether to revise the City of Lakeland's permit as requested.

If you have any questions or would like any additional information regarding this issue, please let me know. Again, we want to thank you and your staff for your continued cooperation in this matter.

Sincerely,



Farzie Shelton  
Environmental Coordinator

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Department of Environmental Protection  
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cc: Clair Fancy, FDEP  
Al Linero, FDEP  
Martin Costello, FDEP  
Jewell Harper, EPA  
Brian Beals, EPA  
Ken Kosky, KBN  
Angela Morrison, HGSS