

Florida Department of
Environmental Protection

Memorandum

TO: Michael G. Cooke

THRU: Trina Vielhaber *TV*
J. F. Koerner *JK*

FROM: Michael P. Halpin *MH*

DATE: March 10, 2006

SUBJECT: Lakeland McIntosh Unit No. 3 FGD Modifications
DEP File No. PSD-FL-008, PA 74-06

Attached is the final permit for Lakeland's McIntosh Unit No. 3. This is an existing coal-fired unit which has requested permission to modify its flue gas desulphurization (FGD) system.

The proposed modifications are being made in order to convert the existing FGD system to forced oxidation. Such changes include the installation of compressors/blowers, air sparging lances and absorber agitators, as well as making changes to the absorber bleed system for dewatering the gypsum byproduct.

The permit conditions are designed to provide the Department with reasonable assurance that the permitted changes will not cause a PSD significant increase. Since no significant emission increases are expected, no PSD review or BACT Determination was required.

Notice was published in the Lakeland Ledger on Thursday, February 23, 2006. Only one minor comment was received from the applicant, requesting 45 days to perform stack testing rather than 30 days which had been proposed in the draft permit (see attached condition 3). This comment was acceptable and the condition was changed as requested.

I recommend your approval.

Attachments

/mph



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

March 10, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Timothy Bachand
Director Energy Supply
Lakeland Utilities
501 East Lemon Street
Lakeland, FL 33801-5079

Re: DEP File No. PSD-FL-008, PA 74-06
Lakeland McIntosh Unit No. 3 FGD Modifications

Dear Mr. Bachand:

The Department has reviewed your application dated January 26, 2006 concerning planned Flue Gas Desulphurization modifications on McIntosh Unit 3 located in Polk County, Florida. The proposed modifications are being made in order to convert the existing FGD system to forced oxidation. Such changes include the installation of compressors/blowers, air sparging lances and absorber agitators, as well as making changes to the absorber bleed system for dewatering the gypsum byproduct.

In order to ensure the aforementioned changes do not cause PSD significant increases to air emissions, Lakeland Utilities shall comply with the requirements of this permit, however all conditions of existing permits shall remain in force.

McIntosh Unit 3 shall be subject to the following additional conditions:

1. The permittee shall notify the DEP Southwest District one day prior to commencement of the construction activities outlined above and 7 days prior to commencement of any related stack performance testing.
2. The Department's Southwest District shall be notified within 5 days, in writing, upon completion of the related construction activities.
3. Within 45 days of placing Unit 3 on line (after the above FGD modifications are completed) stack testing shall be performed for SO₂ and particulate matter in order to demonstrate that existing permit conditions can be met. Performance tests shall be conducted and data reduced in accordance with methods and procedures in accordance with EPA or DEP approved test methods.
4. This modification, including related activities shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C.
5. Lakeland shall utilize best practices in order to ensure that fugitive emissions resulting from this modification (including subsequent long-term material handling operations) are minimized. In no case, shall particulate emissions from such fugitive emission exceed 20% opacity.
6. A written summary shall be submitted to the Bureau of Air Regulation within 60 days of completion of all above-required tests.

This letter must be attached to and shall become a part of the existing permit.

No other changes to the permit are authorized by this action.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Timothy Bachand
March 10, 2006

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit is issued pursuant to Chapter 403, Florida Statutes. Any party to this order (permit) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of 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 of Appeal must be filed within (thirty) days after this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Sincerely,



Michael G. Cooke, Director
Division of Air Resource
Management

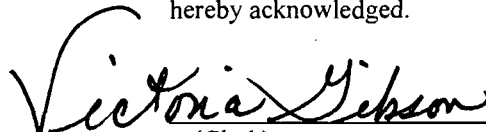
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Construction Permit was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/10/06 to the person(s) listed:

Mr. Timothy Bachand, Lakeland Utilities *
Ms. Farzie Shelton, Lakeland Utilities
Mr. Ken Kosky, Golder
Mr. Jim Little, EPA
Mr. John Bunyak, NPS
Mr. Joel Smolen, SWD
Mr. William Kutash, SWD
Mr. Hamilton Oven, PPSO
Mr. Joe King, Polk County

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

3/10/06
(Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee X Bonnie Brennan</p> <p>B. Received by (Printed Name) C. Date of Delivery Bonnie Brennan 3/13</p>
<p>1. Article Addressed to:</p> <p>Timothy Bachand, Director Lakeland Utilities, Energy Supply 501 E. Lemon Street Lakeland, FL 33801-5079</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from serial)</p>	<p>7005 1820 0007 9819 8368</p>

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

7005 1820 0007 9819 8368

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>											
For delivery information visit our website at www.usps.com											
OFFICIAL USE											
<table border="1"> <tr> <td>Postage</td> <td>\$</td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> </tr> </table>	Postage	\$	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		Total Postage & Fees	\$	Postmark Here
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<table border="1"> <tr> <td>Sent To</td> <td>Timothy Bachand</td> </tr> <tr> <td>Street, Apt. No.; or PO Box No.</td> <td>501 E. Lemon St.</td> </tr> <tr> <td>City, State, ZIP+4</td> <td>Lakeland, FL 33801-5079</td> </tr> </table>		Sent To	Timothy Bachand	Street, Apt. No.; or PO Box No.	501 E. Lemon St.	City, State, ZIP+4	Lakeland, FL 33801-5079				
Sent To	Timothy Bachand										
Street, Apt. No.; or PO Box No.	501 E. Lemon St.										
City, State, ZIP+4	Lakeland, FL 33801-5079										
PS Form 3800, June 2002	See Reverse for Instructions										



Farzie Shelton, chE; REM

Manager of Environmental Affairs

February 23, 2006

Ms. Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

FEB 24 2006

BUREAU OF AIR REGULATION

Attention: Mr. Mike Halpin P.E.

**RE: DEP File No. PSD-FL-008 (PA 74-06)
Lakeland McIntosh Unit No. 3 FGD Modifications**

Dear Ms. Vielhauer:

We are in receipt of the Department's Draft Air Construction Permit for the above referenced Unit. As per requirement of Chapter 50, Florida Statutes, we published the Public Notice of Intent in the Lakeland Ledger on Thursday February 23, 2006. Therefore, enclosed please find proof of publication.

Additionally, we have reviewed the draft permit and have the following comments and request changes to this draft permit. We feel these changes to the permit would not change the emissions and therefore, do not change any of the information in the Public Notice.

1. Condition 3 - Lakeland is requesting a 45 days after placing Unit 3 on line (after the FGD modifications are completed) to perform stack testing instead of 30 days. The requested 45 days would enable Lakeland to address all the startup issues following the change so that stack testing can be performed and the results should be more representative of normal operation.

We appreciate if you would expedite the final permit and as always, your cooperation in this matter is greatly appreciated. If you should have any questions, please do not hesitate to call me.

Sincerely,

Farzie Shelton

Enclosures

cc: Ken Kosky P.E.

Page 1 of 1

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • (863) 834-6603 • Fax (863) 834-8187 • Message System 834-6592

farzie.shelton@lakelandelectric.com

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No's:

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Maria Iannucci, who on oath says that she is Telephone Sales Supervisor of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of Intent to Issue Air Construction Permit

in the matter of Dep File No. PSD-FL-008 (PA 74-06)

Concerning Polk County, C.D McIntosh, Jr. Power Plant-Unit No. 3

was published in said newspaper in the issues of 2-23; 2006

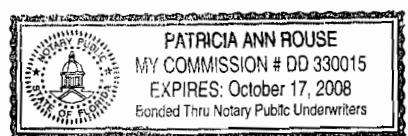
Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said 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..... *Maria Iannucci*
.....
Maria Iannucci
Telephone Sales Supervisor
Who is personally known to me.

Sworn to and subscribed before me this 23rd.....

day of February..... A.D. 20 06.....

Patricia Ann Rouse
.....
Notary Public



(Seal)

My Commission Expires.....

P604

Attach Ad Here

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. PSD-FL-008 (PA 74-06)
Lakeland Utilities
C.D. McIntosh, Jr. Power Plant - Unit No. 3
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to Lakeland Utilities, for the McIntosh Unit 3 Flue Gas Desulfurization (FGD) system. The facility is located at 3030 East Lake Parker Drive, Lakeland, Polk County. The permit is to allow for the conversion of the existing FGD system to forced oxidation, thereby increasing the production of resalable gypsum byproduct. No significant air emissions increase will occur as a result of this permit. The applicant's mailing address is: Lakeland Utilities, 501 East Lemon Street, Lakeland FL 33801.

An air quality impact analysis was not conducted or required. The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact, if there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida, 32301 Telephone: (850) 488-1344 Fax: (850) 922-6979	Florida Department of Environmental Protection Southwest District Office 13051 N. Telecom Parkway Temple Terrace, Florida 33637-0926 Telephone: (813) 632-7600 Fax: (813) 632-7668	Lakeland Utilities Attention: Ms. Farzie Shelton 501 East Lemon Street Lakeland, Florida 33801-5079 Telephone: (863) 834-6603 Fax: (863) 834-8187
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The complete project file includes the application, Draft permit, and the information submitted by the Responsible Official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

P604 2-23; 2006


RECEIVED

FEB 24 2006

BUREAU OF AIR REGULATION

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer
THRU: J. F. Koerner 
FROM: M. P. Halpin
DATE: February 1, 2006
SUBJECT: Lakeland Utilities
McIntosh Unit 3 FGD Modification
DEP File No. PSD-FL-008 and PA 74-06

Attached is the public notice package for Lakeland Utilities McIntosh coal-fired unit 3. The permit is to allow for the conversion of the existing FGD system to forced oxidation, thereby increasing the production of resalable gypsum byproduct. Such changes include the installation of compressors/blowers, air sparging lances and absorber agitators, as well as making changes to the absorber bleed system for dewatering the gypsum byproduct. No significant air emissions increase will occur as a result of this permit.

Based upon Lakeland's submittals as well as the application of engineering principles, there is no reason to expect that the conversion will trigger a PSD review.

I recommend your approval.

/mph

Attachments

P.E. Certification Statement

Lakeland Utilities
McIntosh Unit 3
Polk County

DEP File No.: PSD-FL-008, PA 92-33
Facility ID No.: 105004

Project: FGD Forced Oxidation Conversion

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

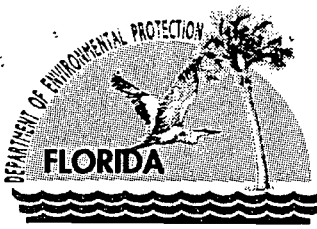


Michael P. Halpin
Michael P. Halpin, P.E.
Registration Number: 31970

2-2-06
Date

Permitting Authority:
Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
North Permitting Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

February 2, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Timothy Bachand
Director Energy Supply
Lakeland Utilities
501 East Lemon Street
Lakeland, Fl 33801-5079

Re: DEP File No. PSD-FL-008 (PA 74-06)
Lakeland McIntosh Unit No. 3 FGD Modifications

Dear Mr. Bachand:

Enclosed is one copy of the Draft Air Construction Permit relative to the proposed forced oxidation conversion of the McIntosh Unit 3 Flue Gas Desulphurization system. The facility is located at 3030 East Lake Parker Drive, Lakeland, Polk County.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to J. F. Koerner, P.E., Administrator, North Permitting Section at the above letterhead address. If you have any other questions, please contact Michael P. Halpin at 850/921-9519.

Sincerely,

For

Trina Vielhauer, Chief,
Bureau of Air Regulation

TV/mph

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Timothy Bachand, Director
Lakeland Utilities
501 East Lemon Street
Lakeland, Florida 33801-5079

DEP File No. PSD-FL-008 (PA 74-06)

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit (copy of Draft permit attached) for the proposed project, detailed in the application specified above and for the reasons stated below.

The applicant, Timothy Bachand, Director Energy Supply, Lakeland Utilities, applied on January 30, 2006, to the Department for an Air Construction Permit for its McIntosh Unit No. 3 Flue Gas Desulphurization (FGD) system. The facility is located at 3030 East Lake Parker Drive, Lakeland, Polk County. The permit is to allow for the conversion of the existing FGD system to forced oxidation, thereby increasing the production of resalable gypsum byproduct. No significant emissions increase will occur as a result of this permit.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an Air Construction Permit is required to modify a pollution control device.

The Department intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

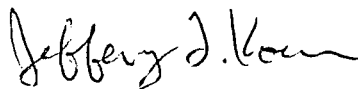
A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



For
Trina Vielhauer., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/3/06 to the person(s) listed:

Mr. Timothy Bachand, Lakeland Utilities *
Ms. Farzie Shelton, Lakeland Utilities
Mr. Ken Kosky, Golder
Mr. Jim Little, EPA
Mr. John Bunyak, NPS
Mr. Joel Smolen, SWD
Mr. William Kutash, SWD
Mr. Hamilton Oven, PPSO
Mr. Joe King, Polk County

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

2/3/06
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. PSD-FL-008 (PA 74-06)

Lakeland Utilities
C.D. McIntosh, Jr. Power Plant - Unit No. 3
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to Lakeland Utilities, for the McIntosh Unit 3 Flue Gas Desulphurization (FGD) system. The facility is located at 3030 East Lake Parker Drive, Lakeland, Polk County. The permit is to allow for the conversion of the existing FGD system to forced oxidation, thereby increasing the production of resalable gypsum byproduct. No significant air emissions increase will occur as a result of this permit. The applicant's mailing address is: Lakeland Utilities, 501 East Lemon Street, Lakeland FL 33801.

An air quality impact analysis was not conducted or required. The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: (850) 488-1344
Fax: (850) 922-6979

Florida Department of
Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813) 632-7600
Fax: (813) 632-7668

Lakeland Utilities
Attention: Ms. Farzie Shelton
501 East Lemon Street
Lakeland, Florida 33801-5079
Telephone: (941) 499-6603
Fax: (941) 603-6335

The complete project file includes the application, Draft permit, and the information submitted by the Responsible Official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

DRAFT

February XX, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Timothy Bachand
Director Energy Supply
Lakeland Utilities
501 East Lemon Street
Lakeland, FL 33801-5079

Re: DEP File No. PSD-FL-008, PA 74-06
Lakeland McIntosh Unit No. 3 FGD Modifications

Dear Mr. Bachand:

The Department has reviewed your application dated January 26, 2006 concerning planned Flue Gas Desulphurization modifications on McIntosh Unit 3 located in Polk County, Florida. The proposed modifications are being made in order to convert the existing FGD system to forced oxidation. Such changes include the installation of compressors/blowers, air sparging lances and absorber agitators, as well as making changes to the absorber bleed system for dewatering the gypsum byproduct.

In order to ensure the aforementioned changes do not cause PSD significant increases to air emissions, Lakeland Utilities shall comply with the requirements of this permit, however all conditions of existing permits shall remain in force.

McIntosh Unit 3 shall be subject to the following additional conditions:

1. The permittee shall notify the DEP Southwest District one day prior to commencement of the construction activities outlined above and 7 days prior to commencement of any related stack performance testing.
2. The Department's Southwest District shall be notified within 5 days, in writing, upon completion related construction activities.
3. Within 30 days of placing Unit 3 on line (after the above FGD modifications are completed) stack testing shall be performed for SO₂ and particulate matter in order to demonstrate that existing permit conditions can be met. Performance tests shall be conducted and data reduced in accordance with methods and procedures in accordance with EPA or DEP approved test methods.
4. This modification, including related activities shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2). F.A.C.
5. Lakeland shall utilize best practices in order to ensure that fugitive emissions resulting from this modification (including subsequent long-term material handling operations) are minimized. In no case, shall particulate emissions from such fugitive emission exceed 20% opacity.
6. A written summary shall be submitted to the Bureau of Air Regulation within 60 days of completion of the completion of all above-required tests.

This letter must be attached to and shall become a part of the existing permit.

No other changes to the permit are authorized by this action.

Mr. Timothy Bachand
February XX, 2006

DRAFT

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit is issued pursuant to Chapter 403, Florida Statutes. Any party to this order (permit) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of 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 of Appeal must be filed within (thirty) days after this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Sincerely,

Michael G. Cooke, Director
Division of Air Resource
Management

/mph

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Farzie Shelton
 Lakeland Utilities
 501 East Lemon Street
 Lakeland, Florida 33801-5079

2. Article Number
(Transfer from service label)

7000 1670 0013 3110 0536

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
Bonnie Brem

B. Received by (Printed Name) C. Date of Delivery
Bonnie Brem

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Timothy Bachand
 Director Energy Supply
 Lakeland Utilities
 501 East Lemon Street
 Lakeland, Florida 33801-5079

2. Article Number
(Transfer from service label)

7000 1670 0013 3110 0512

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
Bonnie Brem

B. Received by (Printed Name) C. Date of Delivery
Bonnie Brem

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark
Here

Mr. Timothy Bachand
 Director Energy Supply
 Lake Utilities
 501 West Lemon Street
 Lakeland, Florida 33801-5079

PS Form 3800, May 2000

See Reverse for Instructions

7000 1670 0013 3110 0110

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark
Here

Ms. Farzie Shelton
 Lakeland Utilities
 501 East Lemon Street
 Lakeland, Florida 33801-5079

PS Form 3800, May 2000

See Reverse for Instructions

7000 1670 0013 3110 0536

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark
Here

Mr. Timothy Bachand
 Director Energy Supply
 Lakeland Utilities
 501 East Lemon Street
 Lakeland, Florida 33801-5079

PS Form 3800, May 2000

See Reverse for Instructions

7000 1670 0013 3110 0512

Brown, Mary Ann

From: Guiseppi, John
Sent: Tuesday, March 07, 2006 12:13 PM
To: 'mike.halpin@dep.state.fl.us'
Cc: Shelton, Farzie; Brown, Mary Ann
Subject: U3 FGD Project Public Notice and Comment

RECEIVED

MAR 10 2006

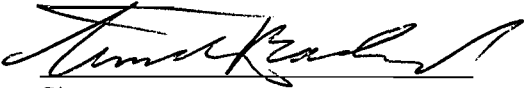
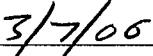
BUREAU OF AIR REGULATION

Good Afternoon Mr. Halpin,

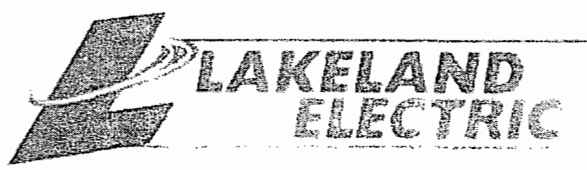
I am emailing you as a follow-up for Farzie and your email this morning concerning the subject line above. Mary Ann will be faxing you a copy of the cover page and a signed RO form. The original hard copy will be sent today via land mail for your records as well.

John Guiseppi
Lakeland Electric
Environmental Affairs
(863) 834-8180

Responsible Official Certification

1. Responsible Official Name :
Timothy Bachand, Director Energy Supply (Interim) - Production
2. Responsible Official Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 E. Lemon St. City: Lakeland State: Florida Zip Code: 33801-5079
3. Owner/Authorized Representative Telephone Numbers... Telephone: (863) 834-6633 ext. Fax: (863) 834-5670
4. Responsible Official Email Address:
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>  Signature  Date

Subject: U3 FGD Modification Letter to Mike Halpin (Notice of published and comment)



100

Farzie Shelton, chE; REM
Manager of Environmental Affairs

February 23, 2006

Ms. Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Mr. Mike Halpin P.E.

**RE: DEP File No. PSD-FL-008 (PA 74-06)
Lakeland McIntosh Unit No. 3 FGD Modifications**

Dear Ms. Vielhauer:

We are in receipt of the Department's Draft Air Construction Permit for the above referenced Unit. As per requirement of Chapter 50, Florida Statutes, we published the Public Notice of Intent in the Lakeland Ledger on Thursday February 23, 2006. Therefore, enclosed please find proof of publication.

Additionally, we have reviewed the draft permit and have the following comments and request changes to this draft permit. We feel these changes to the permit would not change the emissions and therefore, do not change any of the information in the Public Notice.

- 1. **Condition 3** - Lakeland is requesting a 45 days after placing Unit 3 on line (after the FGD modifications are completed) to perform stack testing instead of 30 days. The requested 45 days would enable Lakeland to address all the startup issues following the change so that stack testing can be performed and the results should be more representative of normal operation.

We appreciate if you would expedite the final permit and as always, your cooperation in this matter is greatly appreciated. If you should have any questions, please do not hesitate to call me.

Sincerely,

Farzie Shelton

Enclosures

✓ cc: Ken Kosky P.E.



Farzie Shelton, chE; REM

Manager of Environmental Affairs

January 26, 2006

Ms. Trina Vielhauer, Chief
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JAN 30 2006

BUREAU OF AIR REGULATION

Attention: MR. Jeff Koerner, BAR - Air Permitting

RE: C.D. McIntosh, Jr. Power Plant
Title V Permit # 1050004-016-AV; PSD-FL-008
Conditions of Certification PA 81-13
Notice Forced Oxidation – Exemption from Chapter 62-210 F.A.C.

Dear Jeff:

Thanks you for your e-mail of January 23, 2006 requesting further information in reference to the Forced Oxidation Project at McIntosh Unit No. 3. Accordingly, we requested Mr. Ken Kosky of Golder Associates to complete a P.E. Sealed minor Source Construction Permit Application for this activity addressing the Department's questions including a narrative about the process of forced oxidation changes to material handling, fugitive emission etc. together with a certification from Mr. Timothy Bachand our Responsible Official (please see attached).

The Department is also inquiring whether Lakeland is anticipating any related (non-air) permitting actions as a result of FGD system changes. As you will note from the title of this letter, Lakeland is requesting permit application modification under the condition of certification to accommodate this change of operation. Furthermore, the marketing of the combustion by-products is authorized by the Florida Statutes and is highly preferred method of recycling of these by-products by the Department as opposed to landfill storage facility.

Therefore, we appreciate your help and cooperation in this matter and look forward to hearing from you.

Sincerely,

Farzie Shelton

Enclosures

cc: H. Oven, FDEP

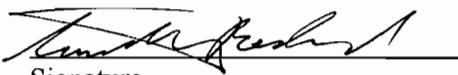
City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Message System 834.6590

farzie.shelton@lakelandelectric.com

Page 1 of 1

Responsible Official Certification

1. Responsible Official Name :	
Timothy Bachand, Director Energy Supply (Interim) - Production	
2. Responsible Official Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 E. Lemon St. City: Lakeland State: Florida Zip Code: 33801-5079	
3. Owner/Authorized Representative Telephone Numbers... Telephone: (863) 834-6633 ext. Fax: (863) 834-5670	
4. Responsible Official Email Address:	
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>	
 Signature	<u>1/25/06</u> Date

Subject: U3 Forced Oxidation

RECEIVED

JAN 30 2006

BUREAU OF AIR REGULATION

**APPLICATION FOR
AIR CONSTRUCTION PERMIT
C.D. MCINTOSH, JR POWER PLANT
LAKELAND, FLORIDA**

**Prepared For:
Lakeland Electric
501 East Lemon Street
Lakeland, Florida 33801-5050**

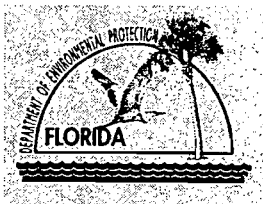
**Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

January 2006

0537632

**DISTRIBUTION:
4 Copies – FDEP
2 Copies – Lakeland Electric
1 Copy – Golder Associates Inc.**

APPLICATION FOR AIR PERMIT – LONG FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Lakeland Electric	
2. Site Name: C.D. McIntosh, Jr. Power Plant	
3. Facility Identification Number: 105004	
4. Facility Location...: Street Address or Other Locator: 3030 East Lake Parker Drive City: Lakeland County: Polk Zip Code: 33805	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Ms. Farzie Shelton, Manager of Environmental Affairs	
2. Application Contact Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 East Lemon Street City: Lakeland State: FL Zip Code: 33801-5050	
3. Application Contact Telephone Numbers... Telephone: (863) 834-6603 ext. Fax: (863) 834-8187	
4. Application Contact Email Address: farzie.shelton@lakelandelectric.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Minor source air construction permit application for the installation of forced oxidization in the existing FGD system for Unit 3. See Part II.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
006	McIntosh Unit 3	AC1F	NA

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Timothy Bachand, Director Energy Supply (Interim) - Production
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 East Lemon Street City: Lakeland State: Florida Zip Code: 33801-5079
3. Owner/Authorized Representative Telephone Numbers... Telephone: (863) 834-6633 ext. Fax: (863) 834-5670
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.</i> _____ Signature _____ Date

APPLICATION INFORMATION

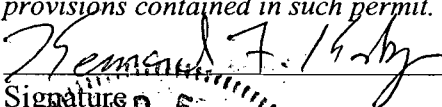
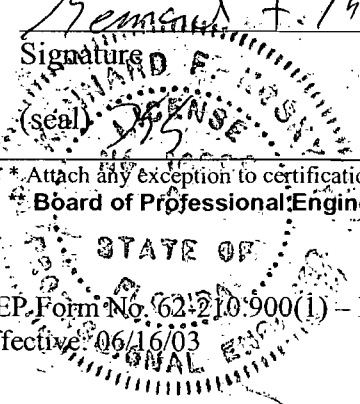
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. 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 compliance plan(s) submitted with this application. _____ Signature _____ Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Kennard F. Kosky Registration Number: 14996
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: kkosky@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, 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 plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, 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.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, 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.</i>  Signature _____ Date <u>1/26/06</u> 

* Attach any exception to certification statement.
Board of Professional Engineers Certificate of Authorization #00001670

FACILITY INFORMATION

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 409.0 North (km) 3,106.2		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 28°04'50" Longitude (DD/MM/SS) 81°55'32"	
3. Governmental Facility Code: 4	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment : The facility consists of three fossil fuel fired steam generators, two diesel engine powered generators, one simple cycle gas turbine and a natural gas fired combined cycle unit.			

Facility Contact

1. Facility Contact Name: Ms. Farzie Shelton, Manager of Environmental Affairs
2. Facility Contact Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 East Lemon Street City: Lakeland State: FL Zip Code: 33801-5050
3. Facility Contact Telephone Numbers: Telephone: (863) 834-6603 ext. Fax: (863) 834-8187
4. Facility Contact Email Address: farzie.shelton@lakelandelectric.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM/PM10	A	N
SO2	A	N
NOx	A	N
CO	A	N
VOC	A	N

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: April 2003
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: April 2003
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: April 2003

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: Part II
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: Part II
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____
 Equipment/Activities On site but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

Additional Requirements Comment

See Part II.

EMISSIONS UNIT INFORMATION

Section [1] of [1]
McIntosh Unit 3

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [1]
McIntosh Unit 3

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
 - The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
 - This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
 - This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **364 MW fossil fuel steam electric generator**

3. Emissions Unit Identification Number:

4. Emissions Unit Status Code: A	5. Commence Construction Date: 1978	6. Initial Startup Date: 01 Sept 82	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--	---	---	--	--

9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: **364 MW**

11. Emissions Unit Comment: **This emission unit is a coal-fired steam-generating unit which co-fires petroleum coke. There will be no changes to the applicable requirements as a result of the installation of forced oxidization on the existing FGD system. Sections E through H are not to be included with this application.**

EMISSIONS UNIT INFORMATION

Section [1] of [1]
McIntosh Unit 3

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
PM - Electrostatic Precipitator (ESP)
SO2 - Flue Gas Desulfurization (FGD) system
NOx - Low NOx Burners (LNB)

2. Control Device or Method Code(s): 10, 67, 24

EMISSIONS UNIT INFORMATION

Section [1] of [1]
 McIntosh Unit 3

C. EMISSION POINT (STACK/VENT) INFORMATION
 (Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: There will be no changes in stack parameters as a result of the force-oxidization system.			

EMISSIONS UNIT INFORMATION

Section **[1]** of **[1]**
McIntosh Unit 3

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): FGD Byproduct (Gypsum)		
2. Source Classification Code (SCC): 30501503		3. SCC Units: tons
4. Maximum Hourly Rate: 22.33	5. Maximum Annual Rate: 195,629	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: See Part II		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [] of []

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [1]
McIntosh Unit 3

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date April 2003
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date April 2003
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date April 2003
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date April 2003 <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input checked="" type="checkbox"/> Attached, Document ID: Part II <input type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]
McIntosh Unit 3

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]
McIntosh Unit 3

Additional Requirements Comment

See Part II

PART II

PART II

Forced Oxidation System for McIntosh Unit 3

Description of Forced Oxidation Conversion Project: McIntosh Unit 3 is a pulverized coal-fired unit with an FGD system to control emissions of sulfur dioxide (SO₂). The current FGD system results in the reaction of SO with calcium (Ca) in the FGD reagent to form primarily calcium sulfite (CaSO₃), as well as calcium sulfate (CaSO₄) or gypsum. The reaction in the FGD absorber to form gypsum is depended upon the amount of available oxygen in the flue gas. The forced oxidation conversion project involves the introduction of additional oxygen using ambient air in the FGD absorbers to force the conversion of CaSO₃ to CaSO₄, therefore completing the reaction to form commercial grade gypsum. The current FGD byproduct is not available for use since it consists primarily of CaSO₃ and is stabilized with fly ash and lime to form a pozzolanic material that is stored in the byproduct storage facility. The amount of air introduced into FGD absorbers is regulated to generally match the amount of oxygen required for the reaction. There is a possibility that not all the oxygen in the ambient air introduced in the FGD absorbers is reacted. This results in additional oxygen in the flue gas.

The forced oxidation conversion project involves the following enhancements to the FGD systems.

- FGD Absorbers – the existing FGD absorbers will be used and enhanced with the installation of a Forced Oxidation Air System that will introduce ambient air. This includes air sparging lances that work in conjunction with the absorber agitators. The introduction of air requires compressors/blowers and air spargers, and is the primary equipment required for the project.
- FGD Recycle Pumps – no change
- FGD Absorber Agitators – will be replaced to improve reaction
- FGD Absorber Bleed System – Centrifugal pumps will be added to provide pressure necessary for using the existing hydroclones for dewatering the gypsum.
- FGD Hydroclones and Thickener – The main dewatering method will use the existing hydroclones followed by the existing thickener.
- FGD Surge Tank – the existing surge tank will be reinforced to accommodate a higher percentage of solids.
- Rotary Vacuum Filters – the existing vacuum filters will be used.
- FGD Byproduct Handling Systems – no change.

The enhancements will allow the use of the FGD byproduct as commercial grade gypsum. Similar enhancements have been made in several FGD systems at other coal-fired generating facilities in Florida that are of similar technology as McIntosh Unit 3. This includes Tampa Electric Big Bend Station, St. Johns River Power Park and Seminole Generating Station.

Effects on Emissions: The forced oxidation conversion will not result in any changes in the emission rates for McIntosh Unit 3. The gypsum byproduct will be slightly drier than the existing byproducts, but still contain sufficient moisture (15 percent) that minimizes fugitive emissions from material handling. Table 1 presents potential fugitive emissions for handling gypsum byproduct. These calculations are based on unloading the gypsum byproduct in a pile and loading into a truck for recycling. The potential fugitive emissions are well less than 1 ton/year. These calculations do not account for the current fugitive emissions from handling the existing byproduct and should be considered worst-case. Experience at existing facilities demonstrated that fugitive emissions are minimal.

The potential increase in oxygen concentrations may artificially increase the lb/MMBtu emissions rates as calculated in the continuous emission monitoring systems (CEMS) if the oxygen F-factor method in 40 CFR Part 60, Method 19 is used. However, this change will be small and the City of Lakeland will continue to utilize the CEMs for compliance. The result may be slightly lower actual emissions necessary to meet compliance. The use of forced oxidation on existing FGD systems have not resulted in non-compliance situations at existing facilities.

Regulatory Evaluation: Under the Rules of the Department of Environmental Protection (FDEP) as defined in Chapter 62-210 a modification is a physical or operation change that increases emissions. The increase in emission are based on increases in annual emissions with the comparison of past actual and future actual appropriate for electric utility steam generating units like McIntosh Unit 3. There will be no increases in actual emissions as a result of the forced oxidation project and would not be defined as a modification under the FDEP rules. The project will however result in the beneficial use of the gypsum and fly ash, that is current stored on-site.

Additional Information: Below is additional information requested by the FDEP

- 1) Please provide a minor source construction permit application, complete with the authorized representative signature and P.E. Seal;
 - This application is the minor source air construction application.
- 2) Please discuss any planned changes to existing or new material handling operations;
 - The material handling operation will remain the same with the exception that fly ash and lime will not be added to the FGD byproduct and the FGD byproduct (gypsum) will be transported offsite for recycling. When recycled, the FGD byproduct will not be handled or stored in the onsite monofill.
- 3) Please discuss the impacts to reagent as well as byproduct storage and handling areas;
 - There will be no changes to the FGD reagent as a result of this project.
- 4) Please itemize and calculate fugitive emissions;
 - Potential (worst-case) fugitive emissions are attached for the FGD byproduct handling.
- 5) Please provide manufacturer information regarding the expected performance impacts of the FGD system as a result of the proposed changes; and
 - This information was provided in the Design Report prepared by Stone & Webster, Inc. previously submitted to the Department. As noted in the design report, there will be no performance changes to the FGD system. Air is introduced in the absorber recirculating tank (see attached drawing) and does not influence the absorption of the SO₂ and FGD reagent.
- 6) Please indicate whether Lakeland anticipates any related (non-air) permitting actions as a result of the FGD system changes.
 - A change in the site certification has been requested pursuant to Rules 62-17.191 and 17.205 F.A.C. Other than the air related aspects covered by this application, the information addresses Section 403.702 F.S. for Resource Recovery and Management.

**TABLE 1
CALCULATIONS OF GYPSUM BYPRODUCT AND FUGITIVE EMISSIONS**

Estimates of Calcium Sulfate and Gypsum Byproduct Produced:			
	Data	Units	Basis
Coal	11,500	Btu/lb	Title V Application, April 2003
Sulfur	3.30%		Title V Application, April 2003
Uncontrolled SO2 Emissions	5.739	lb/MMBtu	Calculated
Controlled SO2 Emissions	0.718	lb/MMBtu	Title V Permit Condition E.9
Difference	5.021	lb/MMBtu	Calculated
Heat Input	3,640	MMBtu/hr	Title V Permit Condition E.1
SO2 Removed	18,276.9	lb/hr	Calculated
	80,052.9	tons/year	100% Capacity Factor
Calcium Sulfate	170,112.4	tons/year	MW of CaSO ₄ : 136
Moisture	15%		Design Parameter
Gypsum Produced	195,629.2	tons/year	Calculated

Fugitive Emissions:

Fugitive emissions based on material drop equations in AP-42, 4th Edition 11.2.3:

$$EF = k \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$$

where: EF is the emission factor in lb/ton
 k is particle size factor; 0.74 for PM and 0.35 for PM10
 U is average wind speed for Tampa International Airport: 8.4 miles/hour
 M is percent moisture: 15 percent

$$EF \text{ PM} = 0.74 \times (0.0032) \times (8.4/5)^{1.3} / (15/2)^{1.4}$$

$$EF \text{ PM} = 0.00027682 \text{ lb/ton}$$

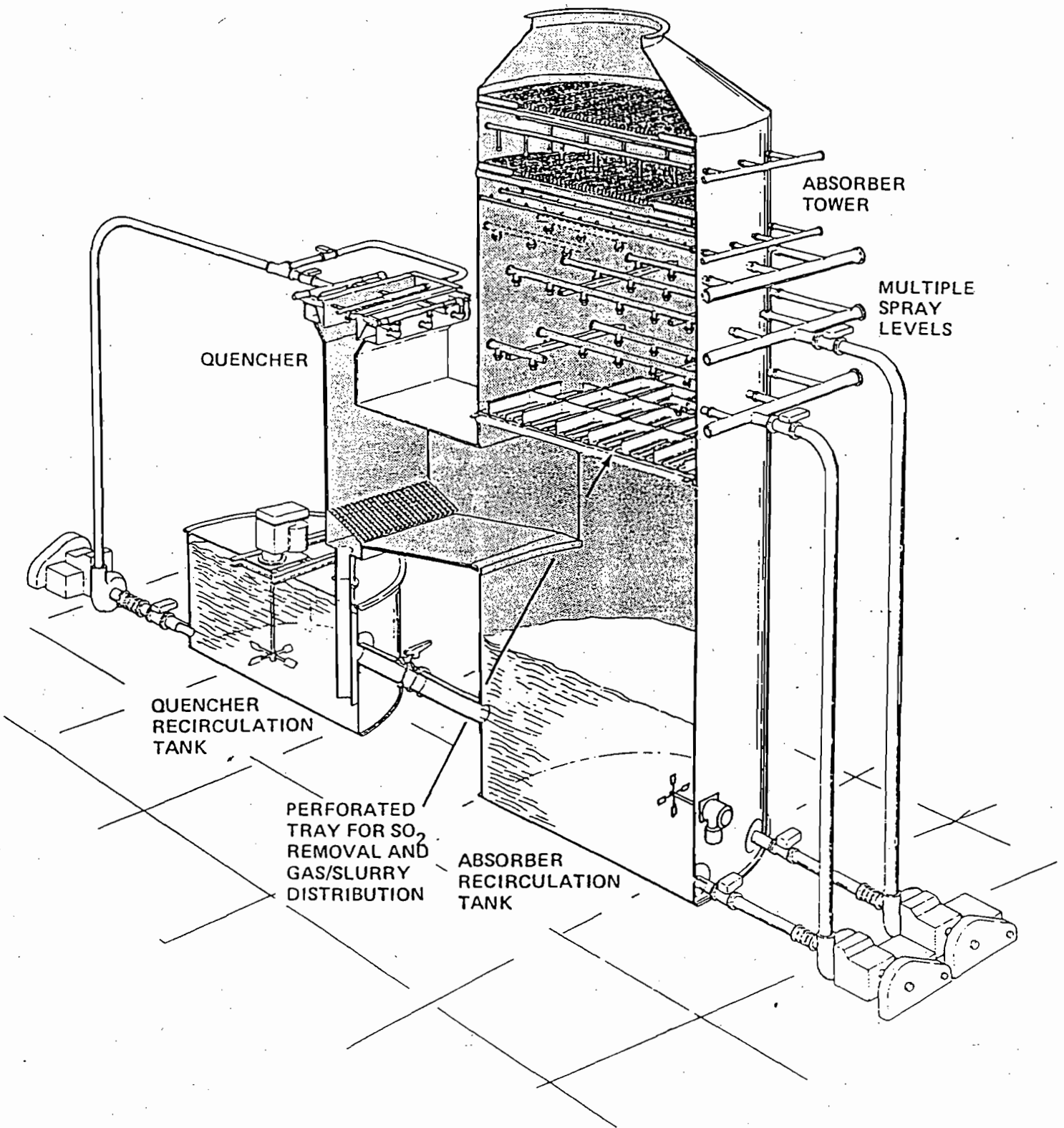
$$EF \text{ PM}_{10} = 0.35 \times (0.0032) \times (7.8/5)^{1.3} / (6/2)^{1.4}$$

$$EF \text{ PM}_{10} = 0.00013093 \text{ lb/ton}$$

Number of Drops	2	Conveyor drop and truck loading
PM Emissions	108.31 lb/year	
	0.05 tons/year	
PM10 Emissions	51.23 lb/yr	
	0.03 tons/year	

**CUTAWAY VIEW OF
MCINTOSH UNIT 3
FGD SYSTEM**

SULFUR DIOXIDE ABSORBER TRAY TOWER MODULE





Farzie Shelton, chE; REM

Manager of Environmental Affairs

January 18, 2006

Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JAN 19 2006

Attention: Ms. Trina Vielhauer, Chief

BUREAU OF AIR REGULATION

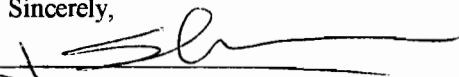
RE: C.D. McIntosh, Jr. Power Plant
Title V Permit # 1050004-016-AV; PSD-FL-008
Conditions of Certification PA 81-13
Notice Forced Oxidation – Exemption from Chapter 62-210 F.A.C.

Dear Trina:

Lakeland Electric is planning a Forced Oxidation Conversion of the Unit No. 3 Flue Gas Desulfurization (FGD) System to produce commercial grade gypsum. The planned FGD System process changes will support the conversion of the existing B&W FGD System to a forced oxidation system that will produce commercial grade gypsum suitable for use by the cement industry with no change in air emissions from this unit (please see attached a P.E. Certified letter from Mr. Ken Kosky of Golder Associates). The process changes will include the addition of an oxidation air system, changes to the density of slurries to be pumped, and modifications to the dewatering equipment. Lakeland is presently marketing, for beneficial use, its combustion by-product generated from the combustion of fossil fuels at the above referenced facility. In furtherance of that strategy, Lakeland will be able to market the gypsum produced from the forced oxidation of Unit No. 3 FGD.

In order to eliminate unnecessary down time of Unit No. 3, Lakeland is planning to make the necessary changes for the forced oxidation in Unit No. 3 planned outage beginning March 15, 2006. Therefore, we would much appreciate if we could get, in a timely manner, a letter from you acknowledging your concurrence with our exemption determination in reference to the Rule 62-210 F.A.C.

Sincerely,


Farzie Shelton

Enclosures

cc: H. Oven, FDEP

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Message System 834.6590

farzie.shelton@lakelandelectric.com

Page 1 of 1

Golder Associates Inc.

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



January 15, 2006

0537632-0100

Lakeland Electric
501 E. Lemon Street
Lakeland, Florida 33801-5079

RECEIVED

JAN 17 2006

Environmental Affairs

Attention: Ms. Farzie Shelton, Manager of Environmental Affairs

RE: C. D. McIntosh, Jr. Power Plant, Unit 3, Facility I.D. #1050004
Final Title V Permit 1050004-016-AV
Forced Oxidation Conversion Project

Dear Farzie:

This Professional Engineer's Certification provides a description, estimated effects on emissions, and regulatory evaluation for the forced oxidation conversion project for the McIntosh Unit 3 flue gas desulfurization (FGD) system.

Description of Forced Oxidation Conversion Project: McIntosh Unit 3 is a pulverized coal-fired unit with an FGD system to control emissions of sulfur dioxide (SO₂). The current FGD system results in the reaction of SO with calcium (Ca) in the FGD reagent to form primarily calcium sulfite (CaSO₃), as well as calcium sulfate (CaSO₄) or gypsum. The reaction in the FGD absorber to form gypsum is depended upon the amount of available oxygen in the flue gas. The forced oxidation conversion project involves the introduction of additional oxygen using ambient air in the FGD absorbers to force the conversion of CaSO₃ to CaSO₄, therefore completing the reaction to form commercial grade gypsum. The current FGD byproduct is not available for use since it consists primarily of CaSO₃ and is stabilized with fly ash and lime to form a pozzolanic material that is stored in the byproduct storage facility. The amount of air introduced into FGD absorbers is regulated to generally match the amount of oxygen required for the reaction. There is a possibility that not all the oxygen in the ambient air introduced in the FGD absorbers is reacted. This results in additional oxygen in the flue gas.

The forced oxidation conversion project involves the following enhancements to the FGD systems.

- FGD Absorbers – the existing FGD absorbers will be used and enhanced with the installation of a Forced Oxidation Air System that will introduce ambient air. This includes air sparging lances that work in conjunction with the absorber agitators. The introduction of air requires compressors/blowers and air spargers, and is the primary equipment required for the project.
- FGD Recycle Pumps – no change
- FGD Absorber Agitators – will be replaced to improve reaction
- FGD Absorber Bleed System – Centrifugal pumps will be added to provide pressure necessary for using the existing hydroclones for dewatering the gypsum.
- FGD Hydroclones and Thickener – The main dewatering method will using the existing hydroclones followed by the existing thickener.
- FGD Surge Tank – the existing surge tank will be reinforced to accommodate a higher percentage of solids.
- Rotary Vacuum Filters – the existing vacuum filters will be used.
- FGD Byproduct Handling Systems – no change.

The enhancements will allow the use of the FGD byproduct as commercial grade gypsum. Similar enhancements have been made in several FGD systems at other coal-fired generating facilities in Florida that are of similar technology as McIntosh Unit 3. This includes Tampa Electric Big Bend Station, St. Johns River Power Park and Seminole Generating Station.

Effects on Emissions: The forced oxidation conversion will not result in any changes in the emission rates for McIntosh Unit 3. The gypsum byproduct will be slightly drier than the existing byproducts, but still contain sufficient moisture (15 percent) that minimizes fugitive emissions from material handling. Experience at existing facilities demonstrated that fugitive emissions are minimal. The potential increase in oxygen concentrations may artificially increase the lb/MMBtu emissions rates as calculated in the continuous emission monitoring systems (CEMS) if the oxygen F-factor method in 40 CFR Part 60, Method 19 is used. However, this change will be small and the City of Lakeland will continue to utilize the CEMs for compliance. The result will be slightly lower actual emissions necessary to meet compliance. The use of forced oxidation on existing FGD systems have not resulted in non-compliance situations at existing facilities.

Regulatory Evaluation: Under the Rules of the Department of Environmental Protection (FDEP) as defined in Chapter 62-210 a modification is a physical or operation change that increases emissions. The increase in emission are based on increases in annual emissions with the comparison of past actual and future actual appropriate for electric utility steam generating units like McIntosh Unit 3. There will be no increases in actual emissions as a result of the forced oxidation project and would not be defined as a modification under the FDEP rules. The project will however result in the beneficial use of the gypsum and fly ash, that is current stored on-site.

Please contact me if there are any questions related to the information contained in this evaluation.

Sincerely,

GOLDER ASSOCIATES INC.

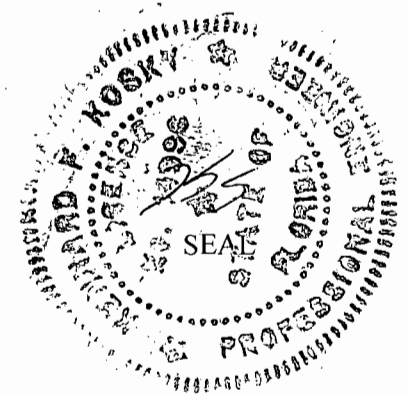


Kennard F. Kosky, P.E.
Principal
Florida Professional Engineer License No. 14996

KFK/

cc: Golder Associates, Inc. Document File

0537632





Farzie Shelton, chE; REM

Manager of Environmental Affairs

January 18, 2006

Mr. Hamilton Oven, Administrator
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 3 2399-2400

**Re: City of Lakeland
McIntosh Power Plant Unit No. 3 PA74-06
Amendment of Certification
Polk County, Florida**

Dear Mr. Oven:

On December 7, 1978, the Governor and Cabinet, sitting as the Siting Board, issued a final order approving certification for the City of Lakeland (Lakeland) McIntosh Power Plant Unit Number 3. The site certification order approved the construction and operation of a 334 MW (net) coal fired unit and associated facilities in Polk County, Florida.

As per our previous discussion and communication, and pursuant to Sections 62-17.191, and 62-17.205, F.A.C., Lakeland hereby requests that the McIntosh Power Plant Unit No. 3 application be amended so as to allow the Forced Oxidation Conversion of the Unit No. 3 Flue Gas Desulfurization (FGD) System to produce commercial grade gypsum. The planned FGD System process changes will support the conversion of the existing B&W FGD System to a forced oxidation system that will produce commercial grade gypsum suitable for use by the cement industry with no change in air emissions from this unit. The process changes will include the addition of an oxidation air system, changes to the density of slurries to be pumped, and modifications to the dewatering equipment. Accordingly, Lakeland has notified the Department's Air Division of this forced oxidation project which will not increase actual emissions and therefore not be defined as a modification under Chapter 62-210 FAC., (please see attached copy of letter to Ms. Trina Vielhauer).

Lakeland's requested application changes are necessary in accordance with the Florida Statutes 403.702 "Resource Recovery and management", Lakeland is presently marketing, for beneficial use, its combustion by-product generated from the combustion of fossil fuels at the above referenced facility. In furtherance of that strategy, Lakeland will be able to market the gypsum produced from the forced oxidation of Unit No. 3 FGD.

Page 1 of 2

City of Lakeland • Department of Electric Utilities

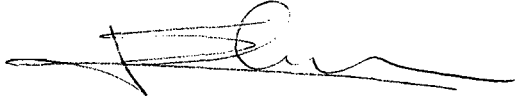
501 East Lemon Street • Lakeland, FL 33801-5050 • (863) 834-6603 • Fax (863) 834-8187 • Message System 834-6592

farzie.shelton@lakelandelectri.com

In order to eliminate unnecessary down time of Unit No. 3, Lakeland is planning to make the necessary changes for the forced oxidation in Unit No. 3 planned outage beginning March 15, 2006. Therefore, we would much appreciate if we could get this application amendment in a timely manner to meet our planned outage.

As always, we appreciate your cooperation in this matter. If you should have any questions, please feel free to contact me.

Sincerely,



Farzie Shelton

Enclosure.

Cc: William Kutash P.E. – DEP Southwest District

Page 2 of 2

City of Lakeland • Department of Electric Utilities

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farzie.shelton@lakelandelectri.com