



Farzie Shelton, chE; REM

Manager of Environmental Affairs

October 18, 2002

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BUREAU OF AIR REGULATION

Mr. Mike Halpin; P.E
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, Mail Station #5505
Tallahassee, Florida 32399-2400

Dear Mr. Halpin:

**Re: Air Construction Permit, DEP File No. PSD-FL-245(PA -74-06)
C. D. McIntosh Power Plant -Unit No. 5**

We are in receipt of the above modified permit and would like to take the opportunity to thank you for all the hard work and cooperation you have extended to us to resolve the startup issues associated with this first generation 501G unit. Additionally, we are writing to confirm our telephone discussion this morning regarding the interpretation of condition No. 26 of this permit addressing NOX averaging during the start-up, shutdown, or fuel changing. Condition No. 26 is as follows:

Excess emissions resulting from startup, shutdown, malfunction or fuel changing shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall

During any calendar day in which a start-up, shutdown, or fuel change occurs, the following alternative NOX limit applies:

100 lb/hr on the basis of a 24-hour average

200 lb/hr on the basis of a 24-hour average if fuel oil is fired during a start-up or shut-down within the 24-hour period.

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

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The Department agrees that, as per permit, the 24 hours is the calendar day (12:00 midnight to 12:00 midnight) and all operating hourly data (including those hours of operation at steady state) during any calendar day in which start-up, shutdown, or fuel changing occurs will be included in the averaging time calculations. However, the excess emission provision of the permit also will apply to such 24 hours and accordingly appropriate hours of excess emission (2 hours or 4 hours whichever applicable) can be excluded from the averaging time.

We will be submitting a copy of this letter to the Southwest district for information and retention on their file. Once again it has been a pleasure working with you on this permit.

Sincerely,



Farzie Shelton

Cc: Bill Proses; P.E.
Department of Environmental Protection
Southwest District

Lakeland Electric:
Jim Stanfield
Tim Bates
Bill Furman
Ed Colter

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