From:	Koerner, Jeff
To:	Holtom, Jonathan
Cc:	Vielhauer, Trina; Walker, Elizabeth (AIR)
Subject:	FW: Lakeland Electric - Fuel Additive Application - ORIS 0676 Facility ID 1050004
Date:	Tuesday, March 22, 2011 6:05:30 PM
Attachments:	LE_Fuel Additive.pdf

Jon,

Brett Galbraith sent me the attached letter addressed to Trina, which references the Title V permit. I skimmed briefly for the project scope.

They plan to try two fuel additives and state that the emissions constitute an insignificant activity under Rule 62-213.430(6), F.A.C.

Based on our conversation this afternoon, it doesn't look like they will need an AC permit and this activity will be picked up when the Title V permit is next re-opened for some other cause.

Thanks!

Jeff

P.S. Elizabeth, they are also sending in a hard copy.

From: Galbraith, Bret [mailto:Bret.Galbraith@lakelandelectric.com]
Sent: Tuesday, March 22, 2011 3:42 PM
To: Koerner, Jeff
Cc: Henry, Danielle D.; 'mcneal.dave@epa.gov'; Shelton, Farzie; Doerr, Doug
Subject: Lakeland Electric - Fuel Additive Application - ORIS 0676 Facility ID 1050004

Good afternoon Mr. Koerner,

Lakeland Electric is considering the utilization of two fuel additives for use in Unit 3 in order to minimize fouling from deposits formed in the combustion process. The additives being considered are manufactured by General Electric Co. (GE). The first additive is called FUELSOLV FMG2970 and is a water based solution containing copper which promotes crystallization at the surface of the ash thus allowing for increased slag porosity and therefore a more friable ash deposit. The second additive is called FUELSOLV FMG2301 and is a water based solution containing magnesium oxide which alters the fusion temperature of the slag, and when combined with the copper solution, works in tandem to increase the friability of the slag resulting in less slag buildup in the boiler. These two fuel additives will enhance the combustion process, and therefore, will reduce the inefficiency caused by boiler slagging and inefficient heat transfer.

Attached you will find a copy of the letter that was sent to your office today, the local FDEP compliance office, and EPA Region IV's office. Attached to that letter is our R.O. certification page, P.E. certification page, and the MSDS sheets for both additives. If you have any questions regarding the application of these additives please feel free to contact

me. Thank you.

Bret Galbraith, E.I.
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