

**Golder Associates Inc.**

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August 25, 2003

0237637

Lakeland Electric  
City of Lakeland  
501 East Lemon Street  
Lakeland, Florida 33801

Attention: Ms. Farzie Shelton, Manager of Environmental Affairs

RE: WINSTON PEAKING STATION NO. 1050352-000-AC  
TITLE V PERMIT APPLICATION - INFORMATION

Dear Farzie:

This correspondence provides information related to the Title V application for the Winston Peaking Station. The basis of the air construction permit was hours per year operation and guaranteed pounds per hour (lb/hr) emission rates from the manufacturer. The fuel use was "calculated" based on heat rate (i.e., Btu/kW-hr and capacity). The fuel consumption for natural gas and oil are accurate based on the "heat content" of the fuel used to calculate these values. Fuel heat content can be variable and Condition 11 of the permit provides an upper limit of fuel use. However, the governing condition of emissions in the air construction permit is based on hours. Moreover, hours of usage are much more accurate to monitor and may be more restrictive.

There is one area that will have to be changed based on the original air permit application. The NO<sub>x</sub> emission rate for natural gas firing in Condition 6 should be 5.58 lb/hr. It was rounded to 5.6 lb/hr in the final permit. The 5.58 lb/hr value is the NO<sub>x</sub> emission rate based on the manufacturer information and was included in the original permit application. Using this NO<sub>x</sub> emission rate, the tons per year are less than that shown in the calculations provided by FDEP. The calculation would be:

$$5.58 \text{ lb NO}_x/\text{hr} \times 89,200 \text{ engine hr/yr} \times \text{ton}/2,000 \text{ lb} = \frac{247.4 \text{ TPY}}{248.9} \text{ (less than the 249.4 TPY limit).}$$

This change can be an administrative correction since this was the number in the permit application and supported by manufacturer information. Moreover, the facility has demonstrated compliance with this limit.

Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Kennard F. Kosky'.

Kennard F. Kosky, P.E.  
Principal  
Professional Engineer Registration Number 14996  
Golder Associates Board of Professional Engineers Certificate of Authorization #00001670

KFK/jkw

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