



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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July 30, 2013

Ms. Carol Kemker, Acting Director
Air, Pesticides, and Toxics Management Division
U.S. Environmental Protection Agency (EPA) – Region 4
61 Forsyth Street, SW
Mail Code: 9T25
Atlanta, GA 30303-8960

Re: Florida's Regional Haze State Implementation Plan

Dear Ms. Kemker:

In 2012, the State of Florida conducted case-by-case best available retrofit control technology (BART) determinations for its affected sources, including Unit 1 at Lakeland Electric's C.D. McIntosh Jr. Power Plant. Florida submitted these determinations to the U.S. Environmental Protection Agency (EPA) as part of its Regional Haze State Implementation Plan (SIP), which EPA has proposed to approve in full.

In conducting its analysis for Unit 1, Florida assumed operation of 8760 hours (though in each of the last four years the unit never operated more than 125 hours) and determined that the level of control already in place is BART for nitrogen oxides (NO_x). Unit 1 is currently required to use best operating practices for good combustion but has no other controls for NO_x emissions and does not have a NO_x emissions limit. Though Florida stands behind its determination for Unit 1, it recognizes that a numeric emission limit for NO_x at Unit 1 reflecting best operating practices for good combustion would strengthen Florida's Regional Haze SIP. Therefore, the state agrees that no later than March 19, 2015, it will submit a Regional Haze SIP amendment to EPA that includes such an emission limit and will modify the Title V operating permit for the facility to include this limit. The limit will be effective no later than the effective date of EPA's approval of the SIP amendment.

Sincerely,

Brian Accardo, Director
Division of Air Resource Management

BA/PC/mb

cc: Scott Davis, Branch Chief, Air Planning Branch, EPA Region 4
Lynorae Benjamin, Division Chief, Air Planning Branch, EPA Region 4