



Farzie Shelton, ChE; REM

Associate GM Technical Support

December 17, 2014

Mr. Jeff Koerner, Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS#5500
Tallahassee, FL 32399
via e-mail to Jeff.Koerner@dep.state.fl.us

**RE: Lakeland Electric – C.D. McIntosh, Jr. Power Plant (ID No. 1050004)
Request for Extension of Time for Compliance with MATS**

Dear Jeff:

As stated in the e-mail sent to the Department on December 16, 2014, Lakeland Electric wishes to request an extension of compliance with NESHAP Subpart UUUUU a.k.a. MATS for our Unit No. 3 (EU 006) at the McIntosh Power Plant (ID No. 1050004). The MATS rule becomes effective on April 16, 2015 (§63.9984(b)). In order to comply with this rule, Lakeland Electric submitted an air construction permit application to the Department on October 21, 2014 for upgrades to the existing wet flue gas desulfurization (FGD) system on Unit 3. Upon issuance of the draft air construction permit (project No. 1050004-038-AC), Sierra Club submitted comments to the Department during the 14-day comment period in which it was requested that the Department hold a public hearing regarding concerns raised by Sierra Club in the comment letter. As a result, it is likely that the final permit will not be issued in time for Lakeland Electric to perform the necessary FGD upgrades on Unit 3 in order to comply with MATS by April 16, 2015, and therefore we have no choice but to apply for compliance extension as allowed under 40 CFR 63.6(i).

Attached, you will find the information that is required to be included in compliance extension requests (per 40 CFR 63.6(i)(6)(i)), prepared by our environmental consultant, Mr. Ken Kosky of Golder Associates.

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As always, we appreciate all the help you can give us in this matter. If you have any questions regarding the enclosed, please do not hesitate to contact me.

Sincerely,



Farzie Shelton

Enclosure

cc: David Read, FDEP, david.read@dep.state.fl.us
Paula Cobb, FDEP, paula.cobb@dep.state.fl.us
Ken Kosky, Golder Associates, Ken_Kosky@golder.com
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**REQUEST FOR EXTENSION OF COMPLIANCE WITH 40 CFR Part 63 Subpart UUUUU
McIntosh Unit 3 (E.U. 006)**

Lakeland Electric is requesting an extension of compliance for McIntosh Unit 3 pursuant to the requirements of 40 CFR 63.6(i)(6)(i). The following presents the required information.

(A) A description of the controls to be installed to comply with the standard;

Lakeland Electric is proposing this project of modifying the FGD system in order to comply with the PM, and SO₂ emissions standards of Subpart UUUUU. Complying with the SO₂ standard is an alternative to comply with the HCl standard. Performance guarantees from the FGD vendor is presented in Attachment A.

The existing wet FGD with forced oxidation system has two B&W absorber tower modules that can each process 50 percent of the flue gas flow or can bypass the flue gas flow. It also has a flue gas reheat system that will reheat the processed flue gas to a certain temperature in order to keep the stack liner dry. Each tower has:

- a. An absorption tray
- b. Three levels of slurry spray nozzles
- c. Primary and secondary moisture separators with spray headers for cleaning the moisture separators
- d. Forced oxidation system with blowers, lances and agitators
- e. Three absorber recirculation pumps each with a dedicated spray header. Two pumps in service and one spare pump.

With the equipment modifications, two absorber recirculation pumps would normally be in service and the third pump will be in service while burning higher sulfur coals. The following modification will be made:

- i. Modify tray bottoms in the existing absorber tray
- ii. New second level absorber tray
- iii. Replacement of Mist Eliminator Trays
- iv. Possibly adding nozzles per layer
- v. Possibly changing nozzle design
- vi. Possibly increasing absorber pump speed

(B) A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:

The intended compliance date for the scrubber upgrades was April 16, 2015. However, the implementation of the project requires an air construction permit by the Department since the upgrades are a "modification" under the FDEP Rule in Chapter 62-210 F.A.C. Lakeland Electric received the draft authorization (Project No. 1050004-038-AC) to complete the scrubber improvements and had published the public notice as required by the Department. An interested party has provided comments and requested a public hearing. While Lakeland Electric does not believe the request meets the requirement of a petition under Chapter 120 Florida Statutes as identified in the public notice, the granting of a public hearing will not allow the issuance of the air construction permit. Without an air construction permit Lakeland Electric will not be able to meet the intended compliance date. A public hearing would require on the order of 4 to 9 months depending upon the scheduling within the requirements of Chapter 120 F.S. This delay would require a rescheduling of the scrubber improvements till later in 2015 and early 2016. The dates presented below reflect the best estimate for rescheduling of the planned scrubber upgrades with a public hearing required for the issuance of an air construction permit.

(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated; and

On-site construction will be scheduled for an outage that would occur from November 2015 through April, 2016.

(2) The date by which final compliance is to be achieved.

Final compliance will be no later than April 16, 2016.

(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and

Construction is anticipated to be completed by April 2016.

(4) The date by which final compliance is to be achieved;

Final compliance will be no later than April 16, 2016.