



Farzie Shelton, chE; REM  
Manager of Environmental Affairs

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 6, 2001

Mr. C.H. Fancy, P.E.  
Chief Bureau of Air Regulation  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road, Mail Station #5505  
Tallahassee, Florida 32399-2400

RECEIVED

AUG 08 2001

BUREAU OF AIR REGULATION

Dear Mr. Fancy:

**Re: Draft Air Construction Permit No. 1050352-001-AC  
Winston Peaking Station – Installation of 20 Internal Combustion Engines**

We are in receipt of your letter dated July 25, 2001 and attached Drafts Air Construction Permit, Technical Evaluation and Preliminary Determination, and Public Notice of Intent to Issue Air Construction Permit.

Pursuant to the requirements of Chapter 50, Florida Statutes, on August 1, 2001 we published the "Public Notice of Intent to Issue Air Construction Permit" in the Lakeland Ledger. Therefore, enclosed please find Affidavit of Publication confirming publication of the Department's notice.

If you should have any questions, please do not hesitate to contact me.

Sincerely

Farzie Shelton

Enclosure

cc: J. Griffin  
B. Stokes, SWD  
B. Worley, EPA

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

farzie.shelton@lakelandgov.net

# AFFIDAVIT OF PUBLICATION

## THE LEDGER

### Lakeland, Polk County, Florida

Case No .....

STATE OF FLORIDA)  
COUNTY OF POLK)

Before the undersigned authority personally appeared Ken Holtzinger, who on oath says that he is the Classified Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

..... Notice of Intent to Issue Permit .....

..... in the matter of #10503252-001-AC .....

..... in the .....

..... Court, was published in said newspaper in the issues of .....

..... 8-1; 2001 .....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed .....

*Ken Holtzinger*  
Ken Holtzinger  
Classified Manager  
Who is personally known to me.

Attach Notice Here

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DEP File No. 10503252-001-AC  
Lakeland Electric, Winston Peaking Station  
Lakeland, Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Lakeland Electric, for the Winston Peaking Station located one-mile southeast of the intersection of Airport Road and Old Tampa Highway, Lakeland, Polk County. The permit is to install 20 Internal Combustion (IC) Engines, each rated at 2.5 MW nominal of the new facility. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.403, F.A.C., Prevention of Significant Deterioration (PSD). The applicant's mailing address is: Lakeland Electric, 501 East Lemon Street, Lakeland, FL 33801-5070.

In order to ensure that a BACT determination is unnecessary, the Department will apply a facility-wide emissions cap for nitrogen oxides (NO<sub>x</sub>) and limit the total operating hours for the 20 IC engines. The IC engines will be equipped with selective catalytic reduction for NO<sub>x</sub> control and oxidation catalyst for CO control. The engines will be also equipped with noise reduction silencers. The restriction in the operating hours will provide reasonable assurance that emissions of the remaining criteria pollutants will remain below the significant net emission increase thresholds. The Department will require the use of run time meters for the 20 IC engines. The IC engines will be fired exclusively with low-sulfur (maximum of 0.05 weight percent sulfur) diesel fuel oil for the first two years and will operate at base and peak load. The IC engines are capable of firing natural gas with a percent diesel fuel for ignition. Firing with natural gas will commence in two years when the pipeline is laid out to the facility.

An air quality impact analysis was not conducted. Emissions from the facility will not consume PSD increment and will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The project has an insignificant impact on the Chassahowitzka PSD Class I area.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5506, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.603(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within four-teen days of receipt of this notice of intent, whichever occurs first. Under section 120.603(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of this petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact, if there are none, the petitioner must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding. In accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619-8218 Telephone: 813-744-6100 Fax: 813-744-6084	Polk County Environmental Services Dept Natural Resources Division 4177 Ben Durrance Road Barrow, Florida 32830 Telephone: 863/534-7377 Fax: 863/534-7374
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The complete project file includes the application, technical evaluations, Draft permit, and the information submitted by the responsible official, exceptive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information. The Department's technical evaluations and Draft Permit can be viewed at www.dep.state.fl.us/air/permitting.htm by clicking on Utility and Other Facility Permits.

F632 - 8-1, 2001

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AUG 08 2001

BUREAU OF AIR REGULATION

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL 32653-1500  
Telephone (352) 336-5600  
Fax (352) 336-6603  
July 24, 2001



9937510

Mr. A. A. Linero, P.E., Administrator  
New Source Review Section  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

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JUL 26 2001

BUREAU OF AIR REGULATION

Attention: Mr. Syed Arif, P.E.

RE: REQUEST FOR ADDITIONAL INFORMATION  
DEP FILE NO. 10503052-001-AC  
CITY OF LAKELAND; WINSTON PEAKING PROJECT

Dear Syed:

This correspondence presents information requested in the Department's letter dated July 10, 2001 regarding the Winston Peaking Station that will consist of 20 diesel engines. The additional information is presented in the same order as requested in the letter.

1. The operational setup for the Winston Peaking Station was given as either on-site or remote operation. If the setup is remote, where will the control systems be located?

Information: The control system regulating the units will be on-site. The City of Lakeland will have a connection using fiber optics to allow remote operation of the units.

2. The response indicates that the heat input limit of 1,084,245 MMBtu/yr for oil firing includes the heat input from peak load operation of 486,005 MMBtu/yr. Is this correct? By using the NO<sub>x</sub> emission factor of 0.5 lb/MMBtu, the total NO<sub>x</sub> emissions from the facility due to oil firing will be greater than 249 tpy (1,084,245 MMBtu/yr x 0.5 lb/MMBtu x 1/2000 ton/lb = 271 tpy). Please show the steps in arriving at 0.5 lb/MMBtu NO<sub>x</sub> emission factor for oil firing at 100% load.

Information: As discussed during our telephone conversation of July 11, 2001, it was acknowledged that hours would be a more direct method of assuring that the total emissions would not exceed the PSD threshold. The hours would be based on total engine hours. The heat input method inherently has "round-off" associated that may confound the calculations as you have noted in the incompleteness letter. The total engine hours and associated emissions for each fuel are as follows:

Baseload Oil: 2,150 hours/engine x 20 engines = 43,000 engine hours (249.1 tons NO<sub>x</sub>/year)  
Peak Load Oil: 876 hours/engine x 20 engines = 17,520 engine hours (121.8 tons NO<sub>x</sub>/year)  
Baseload Gas: 4,460 hours/engine x 20 engines = 89,200 engine hours (248.8 tons NO<sub>x</sub>/year)

Since the City of Lakeland desires to have all three modes of operation, the total hours authorized must be adjusted based on the amount of operation in each mode. This can be determined by determining the tons/engine hour and developing a ration between the modes of operation. The tons/hour associated with each mode of operation is as follows:

Baseload Oil: 249.1 tons NO<sub>x</sub>/year x 1/43,000 engine hours = 0.0058 tons/engine-hour  
Peakload Oil: 121.8 tons NO<sub>x</sub>/year x 1/17,520 engine hours = 0.0070 tons/engine-hour  
Baseload Gas: 248.8 tons NO<sub>x</sub>/year x 1/89,200 engine hours = 0.0028 tons/engine-hour

Since the most engine hours are available for gas firing, it is requested that the permit limit be based on the 89,200 engine hours with a penalty associated with either baseload oil use or peakload oil usage. This is

**City of Lakeland  
Winston Peaking Station  
Final Emission Data**

1. Natural Gas

	<u>Each 2.50 MW Unit</u>		<u>Total (50 MW)</u>	
	<u>-----59°F-----</u>		<u>-----59°F-----</u>	
	<u>ppmvd</u>	<u>(lb/hr)</u>	<u>ppmvd</u>	<u>(lb/hr)</u>
NO <sub>x</sub>	42.90	2.79	42.90	55.79
SO <sub>x</sub>	-	0.89	-	17.86
Particulate	-	0.26	-	5.28
CO	68.00	2.86	68.00	57.12

\*\* These values are provided using Low Heating Values (LHV) for each fuel.  
Exhaust Gases (maximum load) \*\*\*

2. #2 Fuel Oil

	<u>-----59°F-----</u>		<u>-----59°F-----</u>	
	<u>ppmvd</u>	<u>lb/hr</u>	<u>ppmvd</u>	<u>lb/hr</u>
NO <sub>x</sub>	90.00	5.79	90.00	115.84
SO <sub>x</sub>	-	9.22	-	184.32
Particulate	-	0.79	-	15.84
CO	12.82	0.53	12.82	10.56
VOC				