



Farzie Shelton, chE; REM

Manager of Environmental Affairs

February 23, 2004

Jim Pennington P.E.  
Program Administrator  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

Mike Halpin P.E.  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

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BUREAU OF AIR REGULATION

**RE: Winston Peaking Station, Permit Nos. 1050352-001-AC and  
Request to Revise Air Construction Permit and  
Incorporate Change in Initial Title V Air Operation Permit**

Dear Jim and Mike:

By this letter, Lakeland Electric respectfully requests that two of the air permit conditions addressing visible emissions for the Winston Peaking Station be revised to reflect that the visual emissions testing duration is 30 minutes and that annual testing is required only on individual units operating for more than 400 hours per year. The Department issued the air construction permit, referenced above, on August 20, 2001, and the draft Title V permit in June of 2002. The Department has not yet issued the final Title V permit. Assuming that a notice would be required to reflect the changed conditions in the Title V permit, Lakeland Electric requests that the request to revise the air construction permit be processed simultaneously with the request to revise the Title V permit to avoid duplicative public notices.

Specifically, Lakeland Electric requests that Conditions 7 and 20 in the air construction permit and Conditions A.7 and A.15 in the Title V Permit be revised to reflect annual visible emissions tests with 30-minute durations for individual units operating more than 400 hours

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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@lakelandelectric.com

per year. The 30-minute duration is appropriate based on the Department's regulations for all units with potential particular matter emissions of less than 100 tons per year, and a clarification in the permit would help ensure that the Department's inspectors and the Winston Peaking Station personnel have a common understanding.

Also, consistent with the Department's regulations and permit conditions for other similar emission units, annual tests should be required only on units that operate for more than 400 hours. The visible emissions standard applicable to these units is not unit-specific; rather it is the generic, facility-wide standard of 20 percent. Annual tests should therefore be unnecessary, and at a minimum only required on units operating for more than 400 hours.

To incorporate these two changes in the Construction and Title V permits, we suggest the following language respectively:

7/A.7. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. **Because each of the units has a potential to emit less than 100 tons per year of particular matter, the required minimum period of observation for a compliance test shall be thirty (30) minutes.** Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.  
[Rules 62-296.320(4)(b)1 and 62-297.310(4)(a)2, F.A.C.; and, 1050352-001-AC]

20/A.14. Annual Performance Tests. To demonstrate compliance with the emission standards specified in this permit, the permittee shall conduct annual performance tests for visible emissions on **each** emissions unit that operated **for more than 400 hours** in the preceding 12-month period. Annual performance tests for NO<sub>x</sub> shall be conducted on the emission units that emitted more than 100 tons per year of NO<sub>x</sub> in the preceding 12-month period. The facility will be required to keep 12-month emission totals of NO<sub>x</sub> in tons per year for each internal combustion engine during each federal fiscal year (October 1- September 30). Tests required on an annual basis shall be conducted at least once during each federal fiscal year.  
[Rule 62-297.310(7)(a)4. & 62-297.310(7)(c), F.A.C.; and, 1050352-001-AC]

Thank you for considering these requested changes. If you have any questions or need any additional information, please let me know.

Sincerely,



Farzie Shelton

cc: Joel Smolen P.E., DEP Southwest District Office

