

Golder Associates Inc.

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RECEIVED

December 16, 2002

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Trina Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 23399

BUREAU OF AIR REGULATION

RE: LAKELAND ELECTRIC WINSTON PEAKING STATION
PERMIT NO. 1050352-001-AC
NITROGEN OXIDES (NO_x) ANNUAL EMISSION LIMIT

Dear Ms. Vielhauer:

Project No.: 1050352-003-AC

This correspondence is submitted on behalf of Lakeland Electric to request a minor revision in Specific Condition 6, Section III of the above referenced air construction permit. This condition was issued with a limit on annual NO_x emission of 250 tons per year so that these units would not trigger Prevention of Significant Deterioration (PSD) review under the Department's rules in 62-212.400 F.A.C. However, the criteria for PSD review is an emission rate "equal to or less than" the PSD thresholds [Rule 62-212.400(2)(b)2.b. F.A.C.]. While the original application requested a limit on NO_x of 249.9 tons per year and the production limits effectively limit NO_x emissions to 249.9 tons per year (Specific Conditions 12 and 14), the discrepancy has been noticed during the Department's processing of the Title V permit. Therefore, it is requested that the air construction permit be amended to reflect a NO_x emission limit of 249.9 tons per year as originally requested and as limited by the production rate limits (i.e., fuel use and hours). This will allow further processing of the Title V permit.

Sincerely,

GOLDER ASSOCIATES INC.

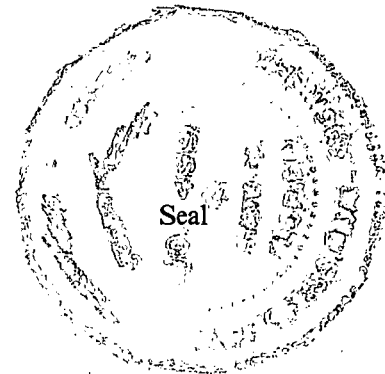
Kennard F. Kosky, P.E.
Principal
Registered Professional Engineer No. 14996
(Golder Associates, Inc. Certificate of Authorization No. 00001670)

KFK/jkw

cc: Ms. Farzie Shelton, Manager of Environmental Affairs

Q. Kinsel, SWD

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DRAFT

Emission Limitations and Standards

A.6.a. Nitrogen Oxides (NO_x). NO_x emissions from each internal combustion engine shall not exceed 13.9 lb/hr while in peak load operation firing distillate oil, 11.6 lb/hr while in base load operation firing distillate oil and 5.6 lb/hr in base load operation while firing natural gas. Annual emissions of NO_x in tpy from these emission units shall be calculated by using the NO_x emission rate in lb/hr for each mode of operation multiplied by the total operating hours for each mode of operation for the 20 engines divided by 2000. This NO_x emission in tpy shall not exceed 250 TPY, based upon a consecutive 12-month period. This facility-wide annual emissions cap of 250 TPY shall become effective on the first day of the month following the initial compliance test of the first internal combustion engine, and compliance shall begin based upon the first twelve months of operation thereafter.
[Rule 62-212.400, F.A.C. (PSD avoidance); and, 1050352-001-AC]

A.6.b. Nitrogen Oxides (NO_x). By this permit, in order to assure that the requirement to submit a PSD application is not triggered, NO_x emissions shall not exceed 240 TPY, based upon a consecutive 12-month period. This facility-wide annual emissions cap of 240 TPY shall become effective on the first day of the month following the initial compliance test of the first internal combustion engine, and compliance shall begin based upon the first twelve months of operation thereafter. In order to make this cap a permanent limit, the permittee shall comply with the terms and conditions contained in the attached **Appendix CP-1, Compliance Plan for Annual NO_x Emissions.**
[Rules 62-4.070, 62-212.400, and 62-213.440, F.A.C.]

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. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1, F.A.C.; and, 1050352-001-AC]

A.8. Ammonia Emissions. The concentration of ammonia in the exhaust gas from each internal combustion engine shall not exceed 10 ppmvd @15% O₂ while firing natural gas or fuel oil.
[Rule 62-4.070, F.A.C.; and, 1050352-001-AC]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

A.9. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.; and, 1050352-001-AC]

A.10. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited.
[Rule 62-210.700(4), F.A.C.; and, 1050352-001-AC]

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) B. Date of Delivery <i>Bonnie Brenu</i> 1-3-03</p>
<p>1. Article Addressed to:</p> <p>Roger D. Harr City Manager City of Lakeland 501 East Lemon Street Lakeland, FL 33801-5079</p>	<p>C. Signature <input type="checkbox"/> Agent <i>X Bonnie Brenu</i> <input type="checkbox"/> Addressee</p>
<p>2. <u>7001 0320 0001 3692 7232</u></p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

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<p>Sent To: <u>Roger D. Harr</u></p> <p>Street, Apt. No., or PO Box No.: <u>E. Lemon St.</u></p> <p>City, State, ZIP: <u>Lakeland, FL 33801-5079</u></p>											
<p>PS Form 3800, January 2001 See Reverse for Instructions</p>											

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