

## Department of Environmental Protection

Lawton Chiles Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee. Florida 32399-2400

Virginia B. Wetherell Secretary

May 5, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Farzie Shelton, Ch.E.
Environmental Coordinator
City of Lakeland
Department of Electric & Water Utilities
501 East Lemon Street
Lakeland, Florida 33801-5050

Dear Ms. Shelton:

Re: Requests to Modify PA-78-06, PSD-FL-008 City of Lakeland, McIntosh Unit No. 3

We have reviewed your letter of April 6, revising your previous modification requests of Site Certification PA-78-06 and PSD-FL-008 for C.D. McIntosh Unit 3. To finalize our review, the following information is requested.

- o Basic drawings of the scrubber serving Unit 3 along with a short process description, the name of the manufacturer, model number and serial number. The basic operating manual would suffice if it has this information.
- o Results of the three most recent annual stack tests for particulate matter, nitrogen oxides, and sulfur dioxide.
- o Rationale for Best Available Control Technology (BACT) requested by the City (0.90 lb/MMBtu, 55% minimum scrubber efficiency). This should be expressed in a manner similar to the attached "Least-Cost-Envelope." It should also include the NSPS "D" and NSPS "D(a)" cases as well as the 85% removal case. Details of credits and charges as appropriate should be included for reagents, water, energy penalties, fuel cost differentials, SO<sub>2</sub> allowances, etc. You may wish to show three curves and sample backup calculations for roughly 1.1% sulfur fuel, as well as 2.2 and 3.3% sulfur fuel.
- o A tabulation (hard copy or diskette) of the past two years worth of coal data, including sulfur content, SO<sub>2</sub> emissions, SO<sub>2</sub> removal efficiency (or sulfur reduction percentage). There is no need for the individual coal analysis sheets.

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Your proposed method of determining and reporting compliance with the  ${\rm SO}_2$  emission limit and sulfur reduction (scrubber efficiency) requirement.

Your application will not be considered complete until we receive the foregoing items. However, we will continue to work on your request in order to expedite our action once we receive the requested information.

If you have any questions about this matter, please call me at (904)488-1344.

Sincerely,

A. A. Linero, P.E.

Administrator

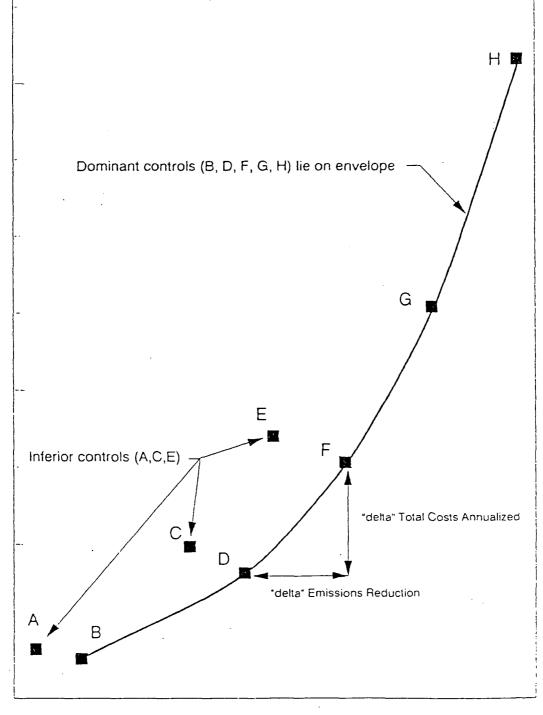
New Source Review Section

AAL/kt

Enclosure

Howard L. Rhodes Clair H. Fancy

Buck Oven



INCREASING EMISSIONS REDUCTION (Tons/yr)

Figure B-1. LEAST-COST ENVELOPE