FLORIDA DEPARTMENT OF
Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Michael Lunday, michael.lunday@lakelandelectric.com
Plant Manager
Lakeland Electric
501 East Lemon Street
Lakeland, Florida 33801

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 1050004-049-AV
C.D. McIntosh, Jr. Power Plant

Dear Mr. Lunday:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the C.D. McIntosh, Jr. Power Plant located in Polk County at 3030 East Lake Parker Drive, Lakeland, Florida, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. Interested persons may view the proposed permit by visiting the following website: https://fldep.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Eric Dunkelberger, at 850/717-9078, or by e-mail at Eric.Dunkelberger@dep.state.fl.us.

Sincerely,

David Lyle Read, P.E.
2018.10.04 09:06:08 -04'00'

For:
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/ead

Copies sent by electronic mail to the following:

Mr. Michael Lunday, Lakeland Electric: michael.lunday@lakelandelectric.com
Mr. Sal Mohammad, P.E., Golder Associates Inc.: sal_mohammad@golder.com
Mr. Nedin Bahtic, P.E., Lakeland Electric: nedin.bahtic@lakelandelectric.com
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EPA Region 4: R4TitleVFL@epa.gov
Ms. Lynn Scearce, DEP OPC: lynn.scearce@floridadep.gov
Ms. Barbara Friday, DEP OPC: barbara.friday@floridadep.gov

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce

2018.10.04 10:06:12
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Permit No. 1050004-049-AV

I. Public Notice.

An Intent To Issue Air Permit issued to Lakeland Electric for the C.D. McIntosh, Jr. Power Plant located in Polk County at 3030 East Lake Parker Drive, Lakeland, Florida, was clerked on August 22, 2018. The Public Notice Of Intent To Issue Air Permit was published in The Ledger on August 26, 2018. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on August 27, 2018.

II. Public Comments.

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

Letter from Lakeland Electric (LE) [Permittee] dated September 24, 2018.

Comment 1. LE commented that Specific Conditions **C.6** and **C.9** concerning operation of the Unit 3 selective catalytic reduction (SCR) system contain contradictory language. LE requested to append the following language to Specific Condition **C.6**: "…as needed to comply with the [nitrogen oxides] NO_X emission standard in Specific Condition **C.14.b**." LE asserted that the Unit 3 boiler must reach the minimum temperature requirement in order to successfully operate the SCR system. LE stated that the installation of the SCR system was voluntary for compliance with the Clean Air Interstate Rule (CAIR).

Response 1. The Department agrees with the comment. Although Permit No. 1050004-019-AC originally authorized the installation of the SCR system to provide flexibility to comply with CAIR, that permit was revised by Permit No. 1050004-026-AC to establish a new NO_X emission standard to mitigate prospective ozone problems in the area surrounding the facility. Because CAIR no longer applies in the State of Florida, the SCR system would now be used to comply, when necessary, with the new NO_X emission standard established by Permit No. 1050004-026-AC. Specific Conditions **C.6** and **C.9** are revised as follows:

C.6. SCR System. The permittee shall tune, operate, and maintain the SCR system to reduce emissions of NO_X as needed to comply with the NO_X emission standard in Specific Condition **C.14.b**. [Permit Nos. 1050004-019-AC & 026-AC]

C.9. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. ~~Operation of the SCR is not required by this permit.~~ [Rule 62-210.650, F.A.C.]

Comment 2. LE requested to delete the following language from Specific Conditions **C.12.b** and **C.12.c**: "…as defined in Specific Condition **C.23**." LE stated that excluding particulate matter emissions from startup and shutdown as defined in NESHAP 40 CFR 63 Subpart UUUUU provides no additional benefit to the operation of Unit 3. The requested deletion would also unify language in all subparagraphs of Specific Condition **C.12**.

Response 2. The Department agrees with the comment. Specific Condition **C.12** is revised as follows:

C.12. PM Emissions. As determined by a CEMS, emissions of PM shall not exceed the following limits.

a. *Coal/Oil*. Filterable PM shall not exceed 0.030 lb/MMBtu on a 30-operating day rolling average, except during periods of startup and shutdown. *{Permitting Note: For informational purposes only, the filterable PM limit of 0.030 lb/MMBtu equates to 109.2 lb/hour and 478.3 tons/year.}* [40 CFR 63.9991(a)]

b. *Coal*. 0.044 lb/MMBtu, based on a 3-hour average, except during periods of startup and shutdown~~, as defined in Condition **C.23**~~. [Permit No. PSD-FL-008B]

c. *Oil*. 0.070 lb/MMBtu, based on a 3-hour average, except during periods of startup and shutdown~~, as defined in Condition **C.23**~~. [Permit No. PSD-FL-008B]

d. *Fossil Fuels*. 0.10 lb/MMBtu heat input, based on a daily average, except during periods of startup and shutdown. [Rule 62-296.405(2)(b), F.A.C.; and 40 CFR 60.42(a)(1) & 60.45(g)(4)] {*Permitting Note: The permittee has elected to meet the 40 CFR 63 Subpart UUUUU PM emission limit of 0.030 lb/MMBtu with compliance shown by a PM CEMS. Note that NESHAP Subpart UUUUU allows alternatives to this method for demonstrating compliance.}*

Comment 3. LE stated that there is a typographical error in Specific Condition **C.26**. The condition should read "Appendix F of 40 CFR 60, not Appendix A."

Response 3. The Department agrees with the comment. Specific Condition **C.26** is revised as follows:

C.26. PM CEMS. Continuous compliance with the PM emission standards and limits shall be with the PM CEMS in order to be exempted from the CAM requirements contained in 40 CFR 64. The permittee shall certify, operate, and maintain the PM CEMS on Unit 3 in order to be exempted from the NSPS Subpart D requirement to have a continuous opacity monitoring system (COMS). The PM CEMS shall be certified in accordance with Performance Specification 11 of Appendix B of 40 CFR 60 and operated and maintained in accordance with Procedure 2 of Appendix ~~A~~F of 40 CFR 60. [40 CFR 64.2(b)(1)(i) & (vi) and 40 CFR 63.10010(i)]

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed Permit No. 1050004-049-AV, with the changes noted above.