Florida Department of
Environmental Protection

Memorandum

TO: Richard Donelan
John Brown
Al Rushanan
Trudie Bell
Raoul Clark
Cheri Albin
Mike Hickey

From: Steve Palmer SP
Siting Coordination Office

Date: August 20, 1994

SUBJECT: Seminole Electric Cooperative Incorporated Hardee Unit 3 (PA89-25SA)

Attached is the Seminole Electric Cooperative Incorporated (SECI), Site Certification Application insufficiency response for the Hardee Unit 3 electric power generation facility. Review of the response for sufficiency should begin as of this date with comments due to the Siting Coordination Office on November 15, 1994.

If you have any questions, please call me or Buck Oven at 904/ 487-0472.

attachment--

cc: Buck Oven

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

July 1, 1994

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration (PSD) permit application and the Site Certification Application for Seminole Electric Cooperative Incorporated's (SECI) proposed 440 MW combined cycle gas-fired power plant. The proposed project, Hardee Unit 3, would be located on the existing Hardee Power Station site, in Hardee and Polk Counties, 130 km southeast of Chassahowitzka Wilderness Area (WA), a Class I air quality area, administered by the Fish and Wildlife Service (Service). The proposed project would be a significant emitter of nitrogen oxides (NO_x), sulfur dioxide (SO_2), particulate matter (PM/PM_{10}), carbon monoxide (CO), volatile organic compounds (VOC), and sulfuric acid mist (H_2SO_4). The facility is also subject to PSD regulations for beryllium and inorganic arsenic.

Best Available Control Technology Analysis

We have reviewed the Best Available Control Technology (BACT) analysis and are satisfied that the analysis is complete. We believe either low NO_x combustors or selective catalytic reduction (SCR) represents BACT for gas-fired cogeneration turbines. We support industry and manufacturer efforts to develop technology which approaches control levels achieved by add-on controls. Such pollution control efforts are advantageous provided similar reductions in pollution can be achieved. We agree that 15 ppm represents a BACT limit which manufacturers are currently comfortable guaranteeing to their customers. We understand that some manufacturers are hoping to design combustors which will achieve even lower rates to further approach the rates achieved by SCR. Earlier this year, we reviewed an application for turbines at Tampa Electric Company's (TECO) Mulberry facility. BACT for TECO's turbines was the use of dry-low NO_x combustors to achieve 9 ppm. Therefore, while we do not object to a BACT emission level of 15 ppm NO_x, we suggest

SECI be required to meet the lowest emission rate that is demonstrated as being achievable over a reasonable amount of time. This will help to verify a true BACT limit and may encourage manufacturers to guarantee emission rates lower than 15 ppm.

Since fuel oil will only be used as a backup fuel, we agree that water injection represents BACT for control of NO_x during fuel oil use; however, the Hartwell Energy Limited Partnership in Georgia is required to meet a 25 ppm NO_x emission limit when firing oil, using water injection. Therefore, we believe SECI should also be required to meet a 25 ppm NO_x emission limit.

We agree that low sulfur fuel (.05 percent sulfur content) represents BACT to minimize sulfur dioxide emissions. Likewise, we agree combustion control represents BACT for carbon monoxide. Note that Florida required the Auburndale Power Partners, LP, to meet 15 ppm for carbon monoxide emissions, using combustion control. Again, the lowest demonstrated emission limit should be set as BACT.

Air Quality Modeling Analysis

The air quality dispersion modeling analysis was performed correctly--ISCST2 modeling predicted violations of the Class I SO_2 increment; however, MESOPUFF II modeling predicted that SECI would not contribute significantly to the violations.

The visibility analysis performed with the EPA VISCREEN model indicates that there should be no impact of a coherent visible plume at Chassahowitzka WA.

Air Quality Related Values Analysis

SECI adequately addressed potential effects to Class I Air Quality Related Values, including vegetation, wildlife, and soils. However, in the discussion of effects to wildlife, SECI mentions that the concentrations of metals in plants are predicted to be much lower than Service recommended safety levels for wildlife; therefore, adverse effects to fish and wildlife are not expected. We would like to note that accumulation of some metals, particularly mercury, occurs primarily through the aquatic food chain, not through ingestion of terrestrial vegetation. Fish are known to accumulate mercury and pass on toxic amounts to fish-eating birds, mammals, and reptiles.

When we receive new information on air quality-sensitive receptors at Chassahowitzka WA, we will forward it to you for use by future PSD applicants.

Thank you for providing us the opportunity to comment on the proposed project. If you have questions, please call Ms. Ellen Porter of our Air Quality Branch in Denver at telephone number 303/969-2071.

Sincerely yours,

James W. Pulliam, Jr.
Regional Director

cc: D. Arif
C. Holladay
B. Owen
J. Kissel, SW Dist
J. Harper, EPA
M. Opalinski, Seminole Electric
CHF/JB/PL

File Copy

Florida Department of

Memorandum **Environmental Protection**

TO: Buck Oven, P.E. Administrator

FROM: For John Brown, P.E. Administrator

DATE: June 27, 1994

SUBJECT: Seminole Electric Cooperative Incorporated (SECI)
Hardee Unit 3 - PA 89-25SA, Mod 8035
PSD-FL-214

The Bureau of Air Regulation finds the above referenced application package insufficient. Based on our initial review of their proposal, we have determined that the following additional information is needed in order to process the application:

1. The application states that the Hardee Power Station was certified for 660 megawatts (MW) in 1990, of which 220 MW was certified for SECI. The application also states that the Hardee Unit 3 Project represents an expansion of the Hardee Power Station site from 220 MW to 440 MW, and the overall site expansion from 660 MW to 880 MW. Please explain why the applicant is seeking approval for 440 MW when 220 MW was already granted to SECI in 1990?

2. Please submit a detailed process flow diagram for the combined cycle unit showing the volumetric air flow rates for each stream when burning natural gas and fuel oil. Also, submit the same for simple cycle operation.

3. Please submit the manufacturer's design specification for the proposed Westinghouse Model 501F combustion turbine. This should include but not be limited to, submitting brochures describing the turbine, associated testing (pilot plant or field) and test methods utilized in determining preliminary laboratory data.

4. Please submit manufacturer's name, model number and maximum steam production rate for the Heat Recovery Steam Generator (HRSG).

5. What is the efficiency of the combustion turbine? Calculate Y (refer to 40 CFR 60, Subpart GG) in kilojoules per watt hour, showing all the calculations.

6. Please provide more information on "steam for power augmentation". This should include but not be limited to, providing bench scale test results by Westinghouse, technical articles on the subject and actual field test results obtained on any combustion turbine worldwide. Also, provide names, addresses and telephone numbers of any owners or states that have either installed or permitted combustion turbines with power augmentation. Also, provide a comparative cost analysis if nitrogen injection is utilized to increase turbine power output rather than steam injection, and what effect will nitrogen injection have on exhaust emissions? Additionally, why can the generator capacity needed in the power augmentation mode not be included in the base load capacity of the combustion turbine?

7. Please describe the circumstances including the number of hours under which the turbine will be operated in simple cycle mode?

8. Please provide the names and addresses of all the manufacturers and suppliers that were contacted for budgetary quotations and engineering estimates in developing capital and annualized cost estimates for this project. Also, list other vendors that were contacted for quotations of the combustion turbine, and if any vendor was willing to provide a turbine in 1999 with a NO_x emissions limit guarantee of less than 15 ppmvd, corrected to ISO conditions and 15% O_2.

9. Please recalculate the cost effectiveness ($/ton NO_x removed) by using 6 ppmvd as the emission limit for a natural gas-fired dry low NO_x combustor equipped with a selective catalytic reduction (SCR) system, and 12 ppmvd as the emission limit for distillate fuel oil. These emission limits are technologically feasible and have been attained by different facilities with SCR.

10. Does the applicant propose to do co-firing of natural gas and fuel oil in the combustion turbine? If so, how long will the co-firing last and provide details on how co-firing will be accomplished.

11. Please submit a detailed listing of all the continuous emission monitoring systems (CEMs) required for this project. This should include the type of the CEM (in-situ or extractive), the pollutant it will monitor, and any associated data acquisition system.

12. What kind of control and monitoring equipment do you propose to use for continuously recording power generation, fuel injection and the steam injection rates?

13. What is the estimated annual throughput and type of air pollution control for the fuel oil storage tank? What are the estimated emissions?

14. In Table 7-6 the value for the 3-Hour HSH is incorrectly given as 30.5 for the period 83040212. Based on the modeling output accompanying the application, the value should be 144 for the period 83032418. Please do a refined analysis for this period and update Table 7-7 with a 1983 value for the 3-Hour HSH.

If there are any questions on the above, please call Syed Arif (Engineering) or Cleve Holladay (Modeling) at 488-1344.

JB/SA/bjb

Florida Department of
Environmental Protection

Memorandum

TO: Martha Nebelsiek
Preston Lewis
Al Rushanan
Trudie Bell
Raoul Clark
Cheri Albin
Mike Hickey

RECEIVED
JUN 03 1994
Bureau of
Air Regulation

From: Steve Palmer
Siting Coordination Office

Date: June 2, 1994

SUBJECT: Seminole Electric Cooperative Incorporated Hardee Unit 3 (PA89-25SA)

This is a reminder that the Seminole Electric Cooperative Incorporated (SECI), Site Certification Application (SCA) for the Hardee Unit 3 electric power generation facility was determined to be complete on May 23, 1994. Review of the SCA for sufficiency should be ongoing with comments due to the Siting Coordination Office on June 27, 1994. A meeting with SECI to discuss any problems or needs for further information has been scheduled for June 14, 1994 at 10:00 a.m. in room 272 of the Twin Towers Building. Please have all reviewers attend this meeting.

If you have any questions, please call me or Buck Oven at 904/ 487-0472.

cc: Buck Oven
Richard Donelan

Florida Department of

Memorandum — Environmental Protection

TO: Martha Nebelsiek
(Preston Lewis)
Al Rushanan
Trudie Bell
Raoul Clark
Cheri Albin
Mike Hickey

RECEIVED
MAY 24 1994
Bureau of
Air Regulation

From: Steve Palmer
Siting Coordination Office

Date: May 23, 1994

SUBJECT: Seminole Electric Cooperative Incorporated Hardee Unit 3 (PA89-25SA)

The Seminole Electric Cooperative Incorporated (SECI), Site Certification Application (SCA) for the Hardee Unit 3 electric power generation facility was determined to be complete on May 23, 1994. Review of the SCA for sufficiency should begin as of this date with comments due to the Siting Coordination Office on June 27, 1994. A tentative schedule of events for this project is attached.

If you have any questions, please call me or Buck Oven at 904/ 487-0472.

attachment--

cc: Buck Oven
Richard Donelan

SEMINOLE ELECTRIC COOPERATIVE
HARDEE POWER STATION UNIT 3
PA _____

SCHEDULE OF DATES

ACTION	DATE
SCA filed	May 9, 1994
DEP requests assignment of Hearing Officer and provides list of agencies	May 16, 1994
DEP determines completeness	May 23, 1994
SECI distributes SCA	May 27, 1994
DEP distributes schedule of dates	May 31, 1994
Newspaper and FAW notice of SCA and PSD	June 8, 1994
Agencies file sufficiency recommendations with DEP	June 27, 1994
Newspaper and FAW notice of land use hearing	July 9, 1994
DEP determines sufficiency	July 15, 1994
Agencies submit preliminary statement of issues	July 29, 1994
Land use hearing held	August 22, 1994
SECI submits information for sufficiency	August 24, 1994
DEP final sufficiency review	Sept. 23, 1994
Land use hearing Recommended Order issued	Sept. 21, 1994
Agencies file final reports	October 27, 1994
SECI provides notice of variances and crossings	November 2, 1994
Siting Board issues Final Order for land use hearing	November 22, 1994
Deadline for agencies to become parties	December 8, 1994
DEP issues final report	January 3, 1995
Newspaper and FAW notice of certification hearing	January 21, 1995
Deadline for intervention	February 6, 1995
Certification hearing begins	March 8, 1995
Recommended Order issued	May 15, 1995
Siting Board's Final order	July 25, 1995

Florida Department of
Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

May 10, 1994

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Harper:

RE: Seminole Electric Cooperative
Hardee Unit 3
Polk County, PSD-FL-214

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by June 10, 1994. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Syed Arif or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Patty Adams

for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosures

Florida Department of
Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

May 10, 1994

Mr. John Bunyak, Chief
Policy, Planning and Permit Review Branch
National Park Service-Air Quality Division
P. O. Box 25287
Denver, CO 80225

Dear Mr. Bunyak:

RE: Seminole Electric Cooperative
Hardee Unit 3
Polk County, PSD-FL-214

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by June 10, 1994. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Syed Arif or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Patty Adams

for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosures

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

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JULIE ROME STEINMEYER

OF COUNSEL
W. ROBERT FOKES

May 9, 1994

HAND DELIVERY

Patty Adams
Bureau of Air Regulation
Department of Environmental Protection
3600 Blair Stone Rd.
Tallahassee, Fla. 32399

RE: Seminole Electric Cooperative;
Application for Site Certification/PSD Permit Application

Dear Ms. Adams:

At the request of Buck Oven, I am sending you four copies of an application for power plant site certification (SCA) which hads been filed with the Department today by Seminole Electric Cooperative. The application is for the 440 Mw Hardee Unit #3 at a site in Hardee County, Florida. The SCA contains, in Volume II, Appendix 10.1.5, the completed application for a prevention of significant deterioration (PSD) permit for the Project. Seminole has provided the Department with an application fee of $72,500 for this project, which has been submitted to Buck Oven.

Please call either Buck Oven or myself should you have any questions on this matter.

Sincerely,

Doug Roberts

Douglas S. Roberts

Encls.

cc: Preston Lewis (w/o encls.)
Buck Oven (w/o encls.)

HOPPING GREEN SAMS & SMITH
PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS
123 SOUTH CALHOUN STREET
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March 24, 1995

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R. SCOTT RUTH
JULIE R. STEINMEYER

OF COUNSEL
CARLOS ALVAREZ
W. ROBERT FOKES

RECEIVED
MAR 24 1995
Bureau of
Air Regulation

Mr. Al Linero
Bureau of Air Regulation
Department of Environmental Protection
Magnolia Courtyard
Tallahassee, FL 32399

RE: Seminole Electric Cooperative, Inc.;
Hardee Unit 3;
Comments on Proposed PSD Permit PSD-FL-214

Dear Mr. Linero:

On behalf of Seminole Electric Cooperative, Inc. (Seminole), I wish to offer the following comments on the Department's proposed prevention of significant deterioration (PSD) permit and the supporting preliminary BACT determination for Seminole's Hardee Unit 3 Project. These written comments supplement the oral and preliminary comments Seminole provided at our meeting on March 7, 1995. Attached to this letter is a marked-up copy of the proposed PSD permit and the preliminary determination with suggested changes. Several of these proposed changes are discussed below.

Steam Augmentation

As we explained in the recent meeting, Westinghouse is developing a dry low NOx combustor that will allow each CT to maintain its minimum output of 150 MW (and the entire unit to achieve 440 MW) during all ambient conditions without the use of steam augmentation. Therefore, Seminole no longer requests a different emission rate for NOx and other emissions for that condition. However, to accommodate the minimum power output throughout the range of ambient conditions, the combustor requires the use of more fuel, thus increasing the heat input rate for the CTs and the emissions of several pollutants. This increased heat input is reflected on the attached markup. The heat input for natural gas changes from 1,799 MMBtu/hr to 1,862 MMBtu/hr and for oil firing, from 1,972 MMBtu/hr to 1,965 MMBtu/hr.

This change in gas turbine design maintains the proposed emission concentrations (in PPM, i.e., 15 PPM for NOx) in the proposed PSD permit, but because of the increased heat input, the emissions of several pollutants in pounds per hour and tons per year increase marginally. These emissions changes are also reflected in the enclosed revised emissions table under Specific Condition B.1., on page 6 of 13 of the proposed permit. Even with this minor increase in total emissions, Seminole's analysis indicates that the outcome of the air quality impact analysis will not significantly change and that all air quality standards will be maintained, and no PSD increments will be exceeded.

Fuel Bound Nitrogen

While Westinghouse has been able to eliminate the need for steam augmentation for the selected CTs, these combustion turbines will only be able to meet the proposed maximum nitrogen oxide emission rate of 42 ppm with a fuel oil containing up to 0.015% nitrogen. For fuel oil containing a greater level of nitrogen, Westinghouse and Seminole continue to request that an allowance for fuel bound nitrogen (FBN) be granted of up to an additional 12 ppm based upon a fuel with a maximum fuel bound nitrogen level of 0.03%. As previously explained to the Department, both orally and through a February 9, 1995 letter from Seminole to Bruce Mitchell, the new dry low NOx combustors are optimized to control nitrogen oxide formation while firing natural gas, the primary fuel, limiting control techniques for NOx formation during oil firing. This dual fuel combustor design makes it impossible for Westinghouse to achieve a thermal NOx level low enough that can accommodate a FBN of 12 ppm while staying within the proposed 42 ppm concentration during oil firing, regardless of fuel nitrogen content.

Like most recent CT projects with DLN combustors and dual fuel capability, the Hardee Unit 3 is being permitted before the combustor design is finalized, constructed and tested. Thus, the Department's permitting levels are well in advance of currently demonstrated technology. It may well be that when placed in operation in 1999, the Westinghouse DLN combustor will be able to achieve a NOx emission rate for all levels of FBN lower than the requested 54 ppm maximum. Also, by 1999, fuel oil with a maximum FBN content of 0.015% may be readily available without an unnecessary extra cost burden to Seminole's consumers. But at this time, those assurances cannot be given by Westinghouse or the fuel suppliers. Without the requested FBN allowance of up to 12 ppm, based upon measured FBN levels, Seminole will be forced to forego oil firing in order to assure compliance with the permit limits or be forced to pay a premium for guaranteed FBN levels of 0.015% from the fuel oil suppliers. However, Seminole's analysis, based upon

surveys of fuel oil suppliers, indicates that such a premium is not BACT when considering the required BACT factors.

The Department's proposed conditions allow the Department to seek to revise the permitted NOx emission rates and levels based upon actual levels achieved during initial operation of the new unit. Seminole is willing to accept that condition. However, Seminole restates its request for a FBN allowance of up to 12 ppm for fuel oil with a maximum FBN of 0.03%.

Other Permit Provisions

Most of the other comments are reflected in the handwritten comments on the attached permit package which the Department issued. Several items warrant particular discussion as follows.

The identified changes in emission rates and levels throughout these marked-up documents are due to the change in the fuel usage and heat input rate as explained above.

At page 6 of 13 of the proposed PSD permit, footnote A to Specific Condition B.1. has been revised to reflect that the 1-hour averaging time for emissions is applied during required compliance testing.

At page 8 of 13, in Specific Condition 6., Seminole requests that approved periods of excess emissions include periods of switching between fuels (natural gas and fuel oil). Experience with CTs suggests that there can be short spikes in emissions when switching fuels and engaging different emission control systems, such as water injection to control NOx. If periods of excess emissions for fuel switching are not authorized, the alternative would be to shutdown the CT and restart it on the second fuel, which would result in even greater total emissions during that shutdown and startup process. Thus, from an emissions standpoint, the requested authorization would result in lower emissions. The Department's excess emissions rules, 62-210.700(5), FAC, authorize the Department to approve periods of excess emissions in such a circumstance based upon "operational variations in types of industrial equipment operations. . .to provide reasonable and practical regulatory controls consistent with the public interest."

At page 9 of 13 in the permit, Seminole proposes revising Specific Condition C.1.i. to allow submittal of natural gas vendor data as a custom fuel sampling procedure for monitoring the sulfur content of natural gas and fuel oil. We understand USEPA must approve such a procedure, but recognizing it in the permit as a possibility would avoid any future need for a permit modification.

At page 9 of 13 in the permit, Seminole proposes revising Specific Condition C.1.j. to allow the use of other EPA approved test methods for compliance tests on CTs without having to seek approval as an alternate test method or a permit modification.

We appreciate the opportunity to provide these comments. Should you or your staff have any questions concerning these comments, please do not hesitate to contact either Ken Bachor at Seminole at 813/963-0994 or me. Following your review of these comments, we also request a meeting with your staff and Clair Fancy to discuss any and all outstanding issues in an effort to resolve these issues prior to the scheduled certification hearing on April 17th. I will call you to set up this meeting.

Sincerely,

Douglas S. Roberts

Encls.

cc: Said Arif, BAR
Steve Palmer, Siting Coord.
Richard Donelan, OGC

Copy for C Lowe & Syed & Pullen Return CPL

Memorandum

Florida Department of
Environmental Protection

TO:	Richard Donelan Preston Lewis Tom Rogers Phil Coram Al Rushanan Al Bishop Don Kell Trudie Bell Mary-Jean Yon Vickie Sharpe Mike Hickey
From:	Steve Palmer SP Siting Coordination Office
Date:	January 26, 1994
SUBJECT:	Seminole Electric Cooperative Incorporated Hardee Unit 3

RECEIVED
JAN 28 1994
Bureau of
Air Regulation

Comments on the revised plan of study for Seminole Electric Cooperative Incorporated's Hardee Unit 3 are due to the Siting Coordination Office on February 21, 1994. If you have any questions, please call me at 487-0472.

cc: Buck Oven