



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

March 20, 2002

Mr. M. P. Opalinski
Director of Environmental Affairs
Seminole Electric Cooperative, Inc.
P. O. Box 272000
Tampa, Florida 33688-2000

Re: Request for Additional Information Regarding Title V Permit Application
DEP File No. 0490340-002-AV
Payne Creek Generating Station, Hardee County

Dear Mr. Opalinski:

The Department is in receipt of your response to our request for additional information dated January 29, 2002. With the receipt of this information, the Department will continue the processing of the above referenced Title V permit application.

If you should have any questions, please call me at 850/921-8985.

Sincerely,

Edward J. Svec
Engineer IV
Title V Section

cc: Thomas W. Davis, PE, Environmental Consulting & Technology, Inc.
Mike Roddy, Seminole Electric Cooperative, Inc.
Robert Manning, Hopping Green
Bill Thomas, PE, FDEP SWD

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C O V E R

FAX

S H E E T

To: Ed Svec
 Company: FDEP
 Fax #: (850) 922-6979
 Subject: Payne Creek Title V
 Date: March 19, 2002
 Pages: 8, including this cover sheet.
 From: Mike Roddy

If you do not receive all of the pages, please call the Copy Room x1282.

COMMENTS:

Seminole Electric Cooperative, Inc.
 P.O. BOX 272000 ❖ Tampa, Florida 33688-2000 ❖ (813) 963-0994
 ❖ Fax (813) 264-7906 ❖



March 19, 2002

Mr. Scott M. Sheplak, P.E.
FDEP-Title V Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Payne Creek Generating Station
DEP File No. 0490340-002-AV

Dear Mr. Sheplak:

In response to your recent request for additional information, attached please find copies of the Responsible Official Statement, Compliance Certification, and the natural gas compliance test results for the Payne Creek Generating Station.

Sincerely,

Mike Roddy
Senior Environmental Engineer

cc: Ed Svec-FDEP Title V Section
Tom Davis-ECT
Bill Thomas-FDEP SWD

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: <u>Michael P. Opalinski, Director, Environmental & Engineering Services</u>		
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Seminole Electric Cooperative, Inc Street Address: 16313 N Dale Mabry Hwy City: Tampa State: FL Zip Code: 33618		
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (813) 963-0994 - Fax: (813) 264-7906		
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>		
<u>M.P. Opalinski</u> Signature		<u>3/19/02</u> Date

* Attach letter of authorization if not currently on file.

Compliance Report and Plan

On the date specified below, the facility and emission units are in compliance with the applicable regulations identified in the application, including the requirements of permit PSD-FL-214A regarding operation on gas. The attached emission tests verify compliance when operating on gas. Emissions testing on fuel oil is scheduled for the fall of 2002. Once completed, and prior to regular operation on oil, Seminole will submit the test report showing compliance.

Compliance with the conditions set forth in the operation permit will be certified on an annual basis (by March 1 for the prior calendar year) by the submittal of the Statement of Compliance DEP Form No. 62-213.900(7), F.A.C.

We understand that we are responding to a Department request for additional information pursuant to 403.0872(2)(c).

Compliance Certification

I, the undersigned, am the responsible official as defined in Chapter 62-210.200(247), F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate and complete.



Michael P. Opalinski
Director, Environmental & Engineering Services

3/19/02

Date

Table J-1. Emissions Test Results - Payne Creek
CT - 1 Gas Fired
1-hour Tests at BaseLoad
Date: 12/10/01

Parameter	Units	Run #1	Run #2	Run #3	Average	Emission Limit
Start Time:		15:35	17:04	18:23		
Stop Time:		16:35	18:04	19:23		
Operating Parameters:						
Load:	MW	167.2	168.6	170.5	168.8	
Fuel Flow:	KSCFH	1785.6	1796.8	1812.9	1798.4	
Gross Heating Value:	Btu/scf	1026.0	1026.0	1026.0	1026.0	
Gross Heat Input:	MMBtu/hr	1832.0	1843.5	1860.0	1845.2	
Volumetric Flow (Method 19 based)(a)	dsfm	779570	780084	787073	782242	
NH3 Injection Rate	GPM	22.99	22.28	22.05	22.44	
Flue Gas Measured Moisture (b)	%V, wet	7.80%	7.80%	7.80%	7.80%	
Ambient Data:						
Dry Bulb Temp	degrees F	78.0	76.0	73.0	75.7	
Wet Bulb Temp	degrees F	66.0	65.0	62.0	64.3	
Barometric Pressure	"Hg	29.80	29.80	29.90	29.83	
Specific Humidity (Hobe)	# H2O/# DA	0.01094	0.01070	0.00936	0.01033	
Emissions Data:						
Oxygen (O2)	%V, dry	13.77	13.73	13.73	13.74	
Carbon Dioxide (CO2) (d)	%V, dry	3	3	3	3	
Nitrogen Oxides (NOx)	ppmV, dry	5.2	5.4	5.7	5.3	
	lb/MMBtu	0.01588	0.01649	0.01579	0.01606	
	ppmV@15% O2	4.3	4.3	4.3	4.4	12
	ppmV@15% O2 & ISO Conditions	4.5	4.6	4.4	4.5	108
	lb/hr (a)	29.1	30.4	29.4	29.6	68
Carbon Monoxide (CO)	ppmV, dry	0.0	0.0	0.0	0.0	20
	lb/MMBtu	0.00000	0.00000	0.00004	0.00001	
	ppmV@15% O2	0.0	0.0	0.0	0.0	
	lb/hr (a)	0.0	0.0	0.1	0.0	71
Total Sulphur (e)	ppm-mol (in fuel)	0.4	0.3	0.4	0.4	
Sulfur Dioxide (SO2) (e)	ppmVd (in flue gas)	0.018	0.012	0.018	0.016	
	lb/MMBtu	0.000068	0.000051	0.000087	0.000068	
	ppmV@15% O2	0.013	0.010	0.013	0.012	
	lb/hr (a)	0.124	0.093	0.128	0.114	5
Sulfuric Acid Mist & SO3(f)	lb/hr	0	0	0	0	1
Total Hydrocarbons (THC)	ppmCH4	0.0	0.0	0.0	0.0	
Methane in Sample	ppmCH4	0.0	0.0	0.0	0.0	
Ethane in Sample	ppmC2H6	0.0	0.0	0.0	0.0	
Total Non-Reactives to Subtract for VOC	ppmC1H4	0.0	0.0	0.0	0.0	
Volatile Organic Compounds (VOC) (e)	ppmCH4	0.0	0.0	0.0	0.0	5
(non-methane, non-ethane)	ppmC3H8, dry	0.0	0.0	0.0	0.0	
	lb/MMBtu	0.00000	0.00000	0.00000	0.00000	
	ppmCH4@15% O2	0.0	0.0	0.0	0.0	
	lbCH4/hr (a)	0.0	0.0	0.0	0.0	10
Visible Emissions Results (EPA M-9)		0.0	0.0	0.0	0.0	10

Notes:

- Fuel Factor (Fd) = 8710scf@0%O2/MMBtu from 40CFR60 Appendix A, Method 19
- (a) - Mass Emission Rates Calculated using the Volumetric Flowrate determined from the Method 19 approach.
- (b) - Moisture determined gravimetrically from M18 runs
- (c) - Sulphur/Sulfur Dioxide determined from fuel analysis
- (d) - CO2 determined from fume analysis
- (e) - VOC determined from GC-FID M18 analysis - all values non-detect

Table 3-2. Emissions Test Results - Payas Creek
 CT - 2 Gas Fired
 3-hour Tests at Baseload
 Date: 12/10/01

Parameter	Units	Run #1	Run #2	Run #3	Average	Emission Limit
Start Time:		16:35	17:04	18:23		
Stop Time:		16:36	18:04	19:23		
Operating Parameters:						
Load:	MW	168.0	170.8	172.3	170.4	
Fuel Flow:	KSCFH	1755.0	1768.0	1780.0	1767.7	
Gross Heating Value:	Btu/scf	1026.0	1026.0	1026.0	1026.0	
Gross Heat Input:	MMBtu/hr	1800.6	1814.0	1826.3	1813.6	
Volumetric Flow (Method 19 based)(a)	dscfm	761936	767580	772790	767435	
NH3 Injection Rate	GPM	23.24	21.79	22.72	22.58	
Flue Gas Calculated Moisture(b)	%V, wet	7.70%	7.80%	7.90%	7.80%	
Ambient Data:						
Dry Bulb Temp.	degrees F	78	78	79	75.7	
Wet Bulb Temp.	degrees F	68	68	62	64.3	
Barometric Pressure:	"Hg	29.8	29.8	29.9	29.83	
Specific Humidity (Hobs):	# H2O# DA	0.01094	0.0107	0.00936	0.01033	
Emissions Data:						
Oxygen (O2)	%V, dry	13.73	13.73	13.73	13.73	
Carbon Dioxide (CO2) (d)	%V, dry	3	3	3	3	
Nitrogen Oxides (NOx)	ppmV, dry	6.0	5.8	6.5	6.1	
	lb/MMBtu	0.01808	0.01764	0.01970	0.01847	
	ppmV@15% O2	4.9	4.8	5.3	5.0	12
	ppmV@15% O2 & ISO Conditions	5.1	5.0	5.4	5.2	108
Carbon Monoxide (CO)	lb/hr (e)	33.6	32.0	36.0	33.5	68
	ppmV, dry	0.0	0.0	0.0	0.0	20
	lb/MMBtu	0.00000	0.00000	0.00004	0.00001	
Total Sulphur (c)	ppmV@15% O2	0.0	0.0	0.0	0.0	
	lb/hr (a)	0.0	0.0	0.1	0.0	
	ppm-anal (in fuel)	0.4	0.3	0.4	0.4	
Sulfur Dioxide (SO2) (c)	ppmVd (in flue gas)	0.016	0.012	0.016	0.016	
	lb/MMBtu	0.000067	0.000051	0.000067	0.000060	
	ppmV@15%O2	0.013	0.010	0.013	0.012	
	lb/hr (a)	0.121	0.092	0.123	0.112	5
Sulfuric Acid Mist & SO3 (f)	lb/hr	0	0	0	0	1
Total Hydrocarbons (THC)	ppmCH4	0.0	0.0	0.0	0.0	
Methane in Sample	ppmCH4	0.0	0.0	0.0	0.0	
Ethane in Sample	ppmC2H6	0.0	0.0	0.0	0.0	
Total Non-Reactives to Subtract for VOC	ppmCH4	0.0	0.0	0.0	0.0	
Volatile Organic Compounds (VOC) (e) (non-methane, non-ethane)	ppmCH4	0.0	0.0	0.0	0.0	3
	ppmC3H8, dry	0.0	0.0	0.0	0.0	
	lb/MMBtu	0.00000	0.00000	0.00000	0.00000	
	ppmCH4@15%O2	0.0	0.0	0.0	0.0	
Visible Emissions Results (EPA M-9)	lbCH4/hr (a)	0.0	0.0	0.0	0.0	10
		0.0	0.0	0.0	0.0	10

Notes:
 Fuel Factor (Fd) = 8710scf@0%O2/MMBtu from 40CFR60 Appendix A, Method 19
 (a) - Mass Emission Rates Calculated using the Volumetric Flowrate determined from the Method 19 approach.
 (b) - Moisture determined gravimetrically from M8 runs
 (c) - Sulphur/Sulfur Dioxide determined from fuel analysis
 (d) - CO2 determined from lyrite analysis
 (e) - VOC determined from GC-FID M18 analysis - all values non-detected
 (f) - See Table 3-1 for details and run times

Table 3-3.

Summary of Emissions Testing Data - Combined SO₃ & H₂SO₄
 Payne Creek
 Bowling Green Fla

Base Load - Unit 1

Parameter	Units	Run #	1	2	AVERAGE
		Date:	12/11/01	12/11/01	
		Start Time:	3:40	6:58	
		Stop Time:	6:49	10:06	
Sampling Train & Analytical Parameters:					
SO₃/H₂SO₄ Titration Data:					
Normality of Barium Perchlorate Solution:	meq/ml		0.0099	0.0099	0.0099
Volume of Sample Solution:	ml		336.00	262.00	299.00
Volume of Sample Aliquot:	ml		100.00	100.00	100.00
Volume of Titrant:	ml		0.00	0.00	0.00
Volume of Titrant for Blank:	ml		0.00	0.00	0.00
Total milliequivalents:	meq		0.000	0.000	0.000
Sampling Train Parameters:					
Metered Volume:	dscf		114.725	116.993	115.859
Gas Stream Volumetric Flowrate:	dscfm		827988.8	851798.1	839893.4
Oxygen:	%V, dry		13.8	13.7	13.7
SO₃/H₂SO₄ Emissions Data:					
SO ₃ /H ₂ SO ₄ Concentration:	lb/dscf		0.00E+00	0.00E+00	0.00E+00
SO ₃ /H ₂ SO ₄ Concentration:	ppmV, dry		0.000	0.000	0.000
SO ₃ /H ₂ SO ₄ Concentration:	ppmV@15%O ₂		0.000	0.000	0.000
SO ₃ /H ₂ SO ₄ Mass Emission Rate:	lb/hr		0.00	0.00	0.00

Table 3-4.

Summary of Emissions Testing Data - Combined SO₃ & H₂SO₄
 Payne Creek
 Bowling Green Fla

Base Load - Unit 2

Parameter	Units	Run #	1	2	3	AVERAGE
		Date:	12/13/01	12/13/01	12/13/01	
		Start Time:	9:17	1:08	4:52	
		Stop Time:	12:37	4:25	8:05	
Sampling Train & Analytical Parameters:						
SO₃/H₂SO₄ Titration Data:						
Normality of Barium Perchlorate Solution:	meq/ml		0.0099	0.0099	0.0099	0.0099
Volume of Sample Solution:	ml		273.00	268.00	281.00	274.00
Volume of Sample Aliquot:	ml		100.00	100.00	100.00	100.00
Volume of Titrant:	ml		0.00	0.00	0.00	0.00
Volume of Titrant for Blank:	ml		0.00	0.00	0.00	0.00
Total milliequivalents:	meq		0.000	0.000	0.000	0.000
Sampling Train Parameters:						
Metered Volume:	dscf		114.732	111.494	114.447	113.113
Gas Stream Volumetric Flowrate:	dscfm		838223.8	846793.2	832251.3	842508.5
Oxygen:	%V, dry		13.8	13.7	13.7	13.7
SO₃/H₂SO₄ Emissions Data:						
SO ₃ /H ₂ SO ₄ Concentration:	lb/dscf		0.00E+00	0.00E+00	0.00E+00	0.00E+00
SO ₃ /H ₂ SO ₄ Concentration:	ppmV, dry		0.000	0.000	0.000	0.000
SO ₃ /H ₂ SO ₄ Concentration:	ppmV@15%O ₂		0.000	0.000	0.000	0.000
SO ₃ /H ₂ SO ₄ Mass Emission Rate:	lb/hr		0.00	0.00	0.00	0.00



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 29, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. P. Opalinski
Director of Environmental Affairs
Seminole Electric Cooperative, Inc.
P. O. Box 272000
Tampa, Florida 33688-2000

Re: Request for Additional Information Regarding Title V Permit Application
DEP File No. 0490340-002-AV
Payne Creek Generating Station, Hardee County

Dear Mr. Opalinski:

Your Title V permit application for the Payne Creek Generating Station was received on December 5, 2001. However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)2., F.A.C.

Demonstration of Compliance

1. Provide, either a signed statement that certifies the facility is in compliance with all applicable requirements of permit 1050340-001-AC, or a compliance plan which details how and when the facility will come into compliance with these requirements.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item number 1 above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Bill Thomas, P.E. at the Department's Southwest District office.

If you should have any questions, please call Edward J. Svec at 850/921-8985.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Thomas W. Davis, PE, Environmental Consulting & Technology, Inc.
Mike Roddy, Seminole Electric Cooperative, Inc.
Bill Thomas, PE, FDEP SWD

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Director of Environmental Affairs
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

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Mr. M.P. Opalinski

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City, State, ZIP+4
Tampa, Florida 33688-2000