

Florida Department of Environmental Protection

Memorandum

To: Joe Kahn, Division of Air Resource Management
Through: Trina Vielhauer, Bureau of Air Regulation *TV*
From: Jeff Koerner, New Source Review Section *JK*
Date: September 18, 2008
Subject: Project No. 0490340-012-AC
Permit No. PSD-FL-344A
Seminole Electric Cooperative, Inc.
Midulla Generating Station
Revision of CO Inlet Testing Requirement

The final permit revision is attached for your approval and signature, which revises the original air construction permit for the new Pratt & Whitney TwinPac simple cycle combustion turbine peaking units at Seminole Electric's existing Midulla Generating Station (formerly known as the Payne Creek Generating Station). Currently, Permit No. PSD-FL-344 requires testing for carbon monoxide (CO) emissions prior to and after the oxidation catalyst. Initial tests demonstrating compliance were conducted in accordance with this requirement. However, because of space constraints, testing before the oxidation catalyst requires the removal of equipment to access the test ports.

The revised permit replaces the requirement to conduct subsequent periodic CO tests prior to the oxidation catalyst with requirements to test, monitor and report the catalyst reactivity. Tests are still required after the oxidation catalyst to determine compliance with the CO emissions standards. The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing.

We separated this request from other simultaneous requests for quick processing. I recommend your approval of the attached final permit revision.

Attachments

TLV/jfk

FINAL DETERMINATION

PERMITTEE

Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. PSD-FL-344A
Project No. 0490340-012-AC
Midulla Generating Station
TwinPac Simple Cycle Combustion Turbine Peaking Units (EU-005 to EU-009)
Revision of Carbon Monoxide (CO) Inlet Testing

Seminole Electric Cooperative, Inc. operates the Midulla Generating Station (formerly known as the Payne Creek Generating Station), which is an existing electrical power plant located in Hardee County, Florida. The final permit for this project replaces the requirement to conduct subsequent periodic CO tests prior to the oxidation catalyst of the TwinPac simple cycle combustion turbine peaking units with requirements to test, monitor and report the catalyst reactivity. Tests are still required after the oxidation catalyst to determine compliance with the CO emissions standards.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on August 29, 2008. The applicant published the Public Notice in The Herald-Advocate newspaper on September 4, 2008. The Department received the proof of publication on September 10, 2008. No petitions or requests for extensions of time to file a petition for an administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Southwest District Office, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the final permit revision.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

NOTICE OF FINAL PERMIT REVISION

In the Matter of an
Application for Permit by:


Michael Opalinski, V.P. of Technical Services
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

Permit No. PSD-FL-344A
Project No. 0490340-012-AC
Midulla Generating Station
Facility ID No. 0490340
CO Inlet Testing Revision

Enclosed is Final Permit No. PSD-FL-344A (Project No. 0490340-012-AC), which revises the original air construction permit five combustion turbine sets at Seminole Electric Cooperative, Inc.'s Midulla Generating Station. This facility is an existing electrical power plant (SIC No. 4911) located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. This plant was formerly known as the Payne Creek Generating Station. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Joseph Kahn, Director
Division of Air Resource Management

FINAL PERMIT REVISION

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the final permit revision) was sent by electronic mail with received receipt requested before the close of business on 9/22/08 to the persons listed:

Mr. Michael Opalinski, Seminole Electric Cooperative, Inc. (mopalinski@seminole-electric.com)

Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. (jramirez@seminole-electric.com)

Mr. Walt Hentze, Seminole Electric Cooperative, Inc. (whentze@seminole-electric.com)

Mr. Tom Davis, ECT, Inc. (tdavis@ectinc.com)

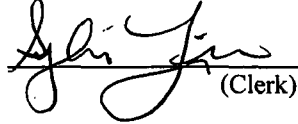
Mr. Mike Halpin, Siting Office (Halpin_M@dep.state.fl.us)

Ms. Cindy Zhang-Torres, Southwest District Office (Cindy.Zhang-Torres@dep.state.fl.us)

Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

9/22/08
(Date)

FINAL PERMIT REVISION

REVISIONS TO PERMIT NO. PSD-FL-344

All construction related to this project is complete and no further construction is authorized by this action. The following permit conditions are revised as follows. Deleted text is shown as ~~strikethrough~~ and new added text is shown with double underline. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements.

Emissions Performance Testing

25. Annual Performance Tests:

- (a) To demonstrate compliance with the emission standards specified in this permit, the permittee shall conduct annual performance tests for NO_x, CO, and visible emissions for each combustion turbine on each fuel. VOC emission tests are not required annually provided the CO emission standards are being met. The CO standard shall be demonstrated initially by the measurement of CO emissions upstream and downstream of the oxidation catalyst and by calculating CO removal efficiency; ~~thereafter,~~ compliance with the CO standard shall be demonstrated by conducting tests downstream of the oxidation catalyst. ~~In the event that the measured removal efficiency is less than or equal to 85%, the Department shall be immediately notified and the oxidation catalyst shall be renewed within 120 calendar days of the test date. Failure to fully comply with this requirement shall represent a violation of this permit. Once the oxidation catalyst is renewed, the Department shall be notified as to the actual date complete.~~ Within the first 24 months of operation, the permittee shall have one coupon of the catalyst from each Twin Pac (5 total) analyzed for catalytic reactivity. Subsequent samples shall be taken at 24-month intervals (± 2 months) and analyzed for catalytic reactivity. The purpose of the sampling program is to track the loss of catalyst reactivity. Based on data collected for the samples, the operator shall appropriately plan for the addition of catalyst or the replacement of catalyst as necessary to ensure compliance with the emissions standards of this permit. Within 60 days of determining the catalyst reactivity, the permittee shall submit a report to the Compliance Authority summarizing the results, the general trend of catalyst reactivity, all CO emissions tests and plans for adding or replacing catalyst. Testing for ammonia slip is required during the first scheduled annual performance tests after the cumulative hours of operation on each combustion turbine exceed 1,500 hours of oil firing or 5,000 hours of gas firing starting from the initial installation of the SCR catalysts. Thereafter, ammonia testing is required during the first scheduled annual performance tests after subsequent cumulative 1,500 hours of oil firing and 5,000 hours of gas firing in each combustion turbine or after regeneration, replacement or addition to the SCR catalyst system. If conducted at permitted capacity, NO_x emissions data collected during the annual NO_x continuous monitor RATA required pursuant to 40 CFR 75 may be substituted for the required annual performance test. Tests required on an annual basis shall be conducted at least once during each federal fiscal year (October 1st to September 30th). In the event that the operation of a combustion turbine is less than 400 hours per year on natural gas or distillate oil, annual testing is not required for that year and that fuel. [Rule 62-297.310(7)(a), F.A.C.]



0490340-012-AC-F.
pdf (1 MB)

Tracking:

Recipient

- ✓ 'mopalinski@seminole-electric.com'
- ✓ 'jramirez@seminole-electric.com'
- ✓ 'tdavis@ectinc.com'
- ✓ Halpin, Mike
- ✓ 'Zhang-Torres@dep.state.fl.us'
- ✓ 'Forney.Kathleen@epamail.epa.gov'
- ✓ Koerner, Jeff
- ✓ Walker, Elizabeth (AIR)
- ✓ Gibson, Victoria

Delivery

- Delivered: 9/22/2008 5:30 PM
- Failed: 9/22/2008 5:30 PM

- Delivered: 9/22/2008 5:30 PM
- Delivered: 9/22/2008 5:30 PM
- Delivered: 9/22/2008 5:30 PM

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Monday, September 22, 2008 5:29 PM
To: 'mopalinski@seminole-electric.com'; 'jramirez@seminole-electric.com'
Cc: 'tdavis@ectinc.com'; Halpin, Mike; 'Zhang-Torres@dep.state.fl.us';
'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)
Attachments: 0490340-012-AC-F.pdf

Click on the link to the documents displayed below and send a "reply" message verifying receipt of the document(s) provided in this email; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

Click on the following link to access the permit project documents:

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0490340.012.AC.F_pdf.zip

This is the official notification of the **Final Permit** and its associated documents for the following project:

Attention:

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-012-AC/ PSD-FL-344A
Permit Status: FINAL
Permit Activity: CONSTRUCTION/ CO Inlet Testing Revision
Facility County: HARDEE
Processor: Jeff Koerner

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp> .

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771

Livingston, Sylvia

From: Mike Opalinski [MOpalinski@seminole-electric.com]
Sent: Tuesday, September 23, 2008 7:22 AM
To: Livingston, Sylvia
Subject: Re: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

Received.

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 9/22/2008 5:29 PM >>>

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Attention:

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.

Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-012-AC/ PSD-FL-344A

Permit Status: FINAL

Permit Activity: CONSTRUCTION/ CO Inlet Testing Revision

Facility County: HARDEE

Processor: Jeff Koerner

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771

<<0490340-012-AC-F.pdf>>

9/23/2008

Livingston, Sylvia

From: Juan Ramirez [JRamirez@seminole-electric.com]
Sent: Tuesday, September 23, 2008 9:33 AM
To: Livingston, Sylvia
Subject: Re: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

Received.

Thanks,

Juan Ramirez
Senior Environmental Engineer
Seminole Electric Cooperative Inc.
16313 N. Dale Mabry
Tampa, FL 33618
813-739-1219 Office
813-610-4748 Cell
813-264-7906 Fax

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 9/22/2008 5:29 PM >>>

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Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-012-AC/ PSD-FL-344A

Permit Status: FINAL

Permit Activity: CONSTRUCTION/ CO Inlet Testing Revision

Facility County: HARDEE

Processor: Jeff Koerner

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771

9/23/2008

Livingston, Sylvia

From: Tom Davis [tdavis@ectinc.com]
Sent: Monday, September 22, 2008 5:36 PM
To: Livingston, Sylvia
Subject: RE: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

Sylvia,

I have received and can view the documents provided.

Thanks.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Monday, September 22, 2008 5:29 PM
To: mopalinski@seminole-electric.com; jramirez@seminole-electric.com
Cc: tdavis@ectinc.com; Halpin, Mike; Zhang-Torres@dep.state.fl.us; Forney.Kathleen@epamail.epa.gov; Koerner, Jeff; Walker, Elizabeth \(\AIR\); Gibson, Victoria
Subject: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

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Attention:

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.

Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-012-AC/ PSD-FL-344A

Permit Status: FINAL

Permit Activity: CONSTRUCTION/ CO Inlet Testing Revision

Facility County: HARDEE

Processor: Jeff Koerner

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Sylvia Livingston

9/23/2008

Livingston, Sylvia

From: Zhang-Torres
Sent: Tuesday, September 30, 2008 11:05 AM
To: Livingston, Sylvia
Subject: RE: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

I got it. Thanks.

Cindy

From: Livingston, Sylvia
Sent: Tuesday, September 30, 2008 10:47 AM
To: Zhang-Torres
Subject: FW: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

Cindy,

Your email was returned. Hopefully this one will get to you.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us

From: Livingston, Sylvia
Sent: Monday, September 22, 2008 5:29 PM
To: 'mopalinski@seminole-electric.com'; 'jramirez@seminole-electric.com'
Cc: 'tdavis@ectinc.com'; Halpin, Mike; 'Zhang-Torres@dep.state.fl.us'; 'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)

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Attention:

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-012-AC/ PSD-FL-344A
Permit Status: FINAL
Permit Activity: CONSTRUCTION/ CO Inlet Testing Revision

Livingston, Sylvia

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Monday, September 22, 2008 5:34 PM
To: Livingston, Sylvia
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(502 B)

Message
Headers.txt (2 KB)

This is the mail system at host mseive01.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 48D80F38_25418_2905_1 2D09D44440

Message Headers.txt

Received: from tlhexsprot2.floridadep.net (tlhexsprot2.floridadep.net [199.73.152.8])
by mseive01.rtp.epa.gov (Postfix) with ESMTP id 156754441C
for <Forney.Kathleen@epamail.epa.gov>; Mon, 22 Sep 2008 17:33:30 -0400 (EDT)
Content-Transfer-Encoding: 7bit
Importance: normal
Priority: normal
Received: from tlhexsmb4.floridadep.net ([172.20.30.47]) by tlhexsprot2.floridadep.net with Microsoft
SMTPSVC(5.0.2195.6713); Mon, 22 Sep 2008 17:29:34 -0400
X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2800.1896
Content-Class: urn:content-classes:message
Return-Receipt-To: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>
MIME-Version: 1.0
Content-Type: multipart/mixed;
boundary="----_=_NextPart_001_01C91CFA.4A1B4371"
Disposition-Notification-To: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>
Subject: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)
Date: Mon, 22 Sep 2008 17:29:26 -0400
Message-ID: <864D0E673032DD47ABE8B4EE542DF7CAC71DC1@tlhexsmb4.floridadep.net>
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
Thread-Topic: MIDULLA GENERATING STATION; 0490340-012-AC (PSD-FL-344A)
thread-index: Ackc+koACPxe+3WyTFm9DVPuecfRrQ==
From: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>
To: <mopalinski@seminole-electric.com>,
<jramirez@seminole-electric.com>
Cc: <tdavis@ectinc.com>,
"Halpin, Mike" <Mike.Halpin@dep.state.fl.us>,
<Zhang-Torres@dep.state.fl.us>,
<Forney.Kathleen@epamail.epa.gov>,
"Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>,
"Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>,
"Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>
X-OriginalArrivalTime: 22 Sep 2008 21:29:34.0700 (UTC) FILETIME=[4ED8C2C0:01C91CFA]

Gibson, Victoria

From: Crandall, Lea
Sent: Friday, September 19, 2008 11:05 AM
To: Gibson, Victoria; Swango, Katie
Subject: RE: From Vickie -- Seminole Electric - Midulla 0490340-012-AC

Hi,

Nothing has been filed.

Thanks,
Lea

Lea Crandall
Agency Clerk
Office of General Counsel
3900 Commonwealth Boulevard, MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212
Fax: (850) 245-2303

FLORIDA DISCOUNT CARD: More than 3,000 retail pharmacies in Florida are now a part of the Florida Discount Drug Card program. See www.FloridaDiscountDrugCard.com for more info or call toll-free, 1-866-341-8894.

From: Gibson, Victoria
Sent: Friday, September 19, 2008 10:40 AM
To: Crandall, Lea; Swango, Katie
Subject: From Vickie -- Seminole Electric - Midulla 0490340-012-AC

Hi,

I need to check and see if you have received comments or a request on this final permit that I am trying to send out today. It is on the revision of CO inlet testing requirement for PSD-FL-344A.

Thanks so much.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resource Management
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533