



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Bill Galanter
Comptroller

Michael W. Greer
Secretary

September 10, 2008

Electronic Mail – Received Receipt Requested

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

Re: Request for Additional Information
Seminole Midulla Generating Station
Project No. 0490340-010-AC, (PSD-FL-214E and PSD-FL-344A)
Project No. 0490340-011-AV, Concurrent Title V Revision
Miscellaneous Permit Revisions

Dear Mr. Opalinski:

On June 9, 2008, we received your application to revise original air construction Permit No. PSD-FL-214 for the two combined cycle units at the Midulla Generating Station and to concurrently revise the existing Title V air operation Permit No. 0490340-006-AV (Project Nos. 0490340-010-AC and 0490340-011-AV). This station was formerly known as the Payne Creek Generating Station and is located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. The existing facility consists of two combined cycle combustion turbines, ten simple cycle combustion turbines and miscellaneous ancillary support equipment. Specifically, you requested: removal of the requirement to conduct the annual compliance stack tests for volatile organic compounds (VOC) and sulfuric acid mist (SAM) emissions; and replacement of the current SAM emission limits with a maximum fuel sulfur limit.

On June 30, 2008, the Department received a request to modify the application for these projects to include a revision of original air construction Permit No. PSD-FL-344 for the five simple cycle combustion turbine sets and a concurrent revision of the existing Title V air operation Permit No. 0490340-006-AV. The new request is to: remove the requirement to conduct the annual compliance stack tests for carbon monoxide (CO) upstream of the oxidation catalyst system; and to remove the requirement to conduct compliance stack tests for VOC prior to the air operation permit renewal.

On August 13, 2008, the Department received a third request to modify the application for these projects to include another revision of original air construction Permit No. PSD-FL-344 for the five simple cycle combustion turbine sets and a concurrent revision of the existing Title V air operation Permit No. 0490340-006-AV. The new request is to increase the maximum permitted heat input rates for the peaking units based on vendor performance curves specifically for the installed units.

On August 26, 2008, the Department met with representatives from Seminole Electric Cooperative, Inc. (Seminole Electric) and discussed the related projects. The following two major issues were discussed.

1. Seminole Electric indicated that CO emissions inlet tests were required before the end of the federal fiscal year (September 30th). Such testing presents a hardship because equipment on and around the units must be

REQUEST FOR ADDITIONAL INFORMATION

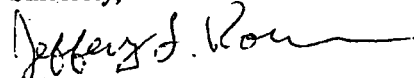
removed to accommodate the test team and apparatus. Since this part of the application request is complete, the Department agreed to consider this as a separate air construction permit revision. On August 29, 2008, the Department issued a draft permit (Project No. 0490340-012-AC) to revise only the CO inlet testing provision. This action is considered a minor modification and requires a 14-day comment period. After a final permit is issued, the permit revision will be incorporated into the pending revision of existing Title V air operation Permit No. 0490340-006-AV (Project No. 0490340-011-AV).

2. The plant is required to conduct stack testing before the end of the federal fiscal year (September 30th). Seminole Electric requested the ability to conduct emissions testing for the combustion turbine peaking units at the higher heat input rates. Seminole Electric provided additional information related to the maximum heat input rates and previous testing. On September 5, 2008, the Department issued an exemption from the requirement to obtain an air construction permit (Project No. 0490340-013-AC) that authorized temporary operation at the higher levels for purposes of conducting emissions testing. The plant must comply with all other permit conditions. The results of the tests will be used to provide reasonable assurance for the permanent request to increase the maximum permitted heat input rates.

The purpose of this letter is to update you on the status of your applications and to remind you that Application Nos. 0490340-010-AC and 0490340-011-AV *will remain incomplete* until the Department receives the results from the annual emissions tests conducted near the higher heat input rates. Along with the test results, please submit any new calculations, assumptions, reference material and the appropriate revised pages of the application form. The above information is requested pursuant to the following regulations of the Florida Administrative Code (F.A.C.): Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your applications after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact me at 850/921-9536.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section

This letter was sent to the following people by electronic mail with received receipt requested.

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)

Friday, Barbara

To: mopalinski@seminole-electric.com
Cc: Juan Ramirez; whentze@seminole-electric.com; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station
Attachments: RAI0490340-010-AC,0490340-011-AV-SeminoleMidullaGeneratingStation.pdf

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Thank you,

DEP, Bureau of Air Regulation

9/10/2008

Friday, Barbara

From: System Administrator
To: Halpin, Mike; Walker, Elizabeth (AIR)
Sent: Wednesday, September 10, 2008 12:08 PM
Subject: Delivered:RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Your message

To: 'mopalinski@seminole-electric.com'
Cc: 'Juan Ramirez'; 'whentze@seminole-electric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station
Sent: 9/10/2008 12:08 PM

was delivered to the following recipient(s):

Halpin, Mike on 9/10/2008 12:08 PM
Walker, Elizabeth (AIR) on 9/10/2008 12:08 PM

Friday, Barbara

From: System Administrator
To: Koerner, Jeff; Zhang-Torres
Sent: Wednesday, September 10, 2008 12:08 PM
Subject: Delivered:RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Your message

To: 'mopalinski@seminole-electric.com'
Cc: 'Juan Ramirez'; 'whentze@seminole-electric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station
Sent: 9/10/2008 12:08 PM

was delivered to the following recipient(s):

Koerner, Jeff on 9/10/2008 12:08 PM
Zhang-Torres on 9/10/2008 12:08 PM

Friday, Barbara

From: Exchange Administrator
Sent: Wednesday, September 10, 2008 12:08 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT66931.txt; RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station



ATT66931.txt (284 RAI - DEP File No.:
B) 0490340-01...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tdavis@ectinc.com

Friday, Barbara

From: Exchange Administrator
Sent: Wednesday, September 10, 2008 12:08 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT66952.txt; RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station



ATT66952.txt (478 RAI - DEP File No.:
B) 0490340-01...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

mopalinski@seminole-electric.com
JRamirez@seminole-electric.com
whentze@seminole-electric.com

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Wednesday, September 10, 2008 12:08 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(497 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 48C7F0E0_6058_591_1 3D2E5443D5

Friday, Barbara

From: Halpin, Mike
Sent: Wednesday, September 10, 2008 12:19 PM
To: Friday, Barbara
Subject: Delivered: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Attachments: ATT67686.txt



ATT67686.txt (153
B)

Your message was delivered to the recipient.

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Wednesday, September 10, 2008 12:21 PM
Subject: Read: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Your message

To: 'mopalinski@seminole-electric.com'
Cc: 'Juan Ramirez'; 'whentze@seminole-electric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station
Sent: 9/10/2008 12:08 PM

was read on 9/10/2008 12:21 PM.

Friday, Barbara

From: Juan Ramirez [JRamirez@seminole-electric.com]
Sent: Wednesday, September 10, 2008 12:22 PM
To: Friday, Barbara
Subject: Re: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Received.

Thanks again,

Juan

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 9/10/2008 12:07
>>> PM >>>

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<<http://www.adobe.com/products/acrobat/readstep.html>> >
<blocked::<http://www.adobe.com/products/acrobat/readstep.html>> .

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Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Wednesday, September 10, 2008 1:15 PM
Subject: Read: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Your message

To: 'mopalinski@seminole-electric.com'
Cc: 'Juan Ramirez'; 'whentze@seminole-electric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station
Sent: 9/10/2008 12:08 PM

was read on 9/10/2008 1:15 PM.

Friday, Barbara

From: Zhang-Torres
Sent: Wednesday, September 10, 2008 1:15 PM
To: Friday, Barbara
Subject: RE: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

Got it. Thanks.

Cindy

From: Friday, Barbara
Sent: Wednesday, September 10, 2008 12:08 PM
To: 'mopalinski@seminole-electric.com'
Cc: 'Juan Ramirez'; 'whentze@seminole-electric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Wednesday, September 10, 2008 1:28 PM
To: Friday, Barbara
Subject: RE: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Wednesday, September 10, 2008 12:08 PM
To: mopalinski@seminole-electric.com
Cc: Juan Ramirez; whentze@seminole-electric.com; tdavis@ectinc.com; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; Koerner, Jeff; Walker, Elizabeth \ (AIR\
Subject: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

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Friday, Barbara

From: Mike Roddy [WMRoddy@seminole-electric.com]
Sent: Wednesday, September 10, 2008 1:56 PM
To: Friday, Barbara
Subject: Re: RAI - DEP File No.: 0490340-010-AC(PSD-FL214E and PSD-FL-344A/0490340-011-AV - Seminole Midulla Generating Station

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 9/10/2008 12:07
>>> PM >>>

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Walker, Elizabeth (AIR)

From: Koerner, Jeff
Sent: Tuesday, August 26, 2008 2:40 PM
To: 'jramirez@seminole-electric.com'; Tom Davis (tdavis@ectinc.com)
Cc: Walker, Elizabeth (AIR)
Subject: Seminole Midulla - removal of CO testing

Juan and Tom,

As we discussed in today's meeting, I have separated your request to remove the inlet CO testing from original Project No. 0490340-010-AC.

This single request will move forward as Project 0490340-012-AC. Since we consider it a minor revision, the public notice it will require only a 14-day comment period. After the final permit is issued, we will incorporate the requirements into pending Project No. 0490340-011-AV as originally requested. We are doing this to accommodate your upcoming test schedule.

I will try to have the draft documents ready soon.

Also as we discussed in today's meeting, you intend to submit a request for an exemption from air construction permitting to allow temporary testing at the higher maximum heat input rate indicated by the vendor.

Thanks!

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
850/921-9536

P.S. Elizabeth, please place a copy of this e-mail in the file as well.

Walker, Elizabeth (AIR)

From: Koerner, Jeff
Sent: Tuesday, August 26, 2008 2:25 PM
To: Walker, Elizabeth (AIR)
Subject: Seminole Midulla - Removal of CO Inlet Testing

Elizabeth,

I met with Seminole today to discuss their pending projects (0490340-010-AC and 0490340-011-AV). In addition to several items regarding these projects, I agreed to separate out one request and issue as a separate AC permit: removal of CO inlet testing. They are coming to the end of the fiscal year which requires them to test at this point. This testing involves removing some equipment so they can get to it. Since we consider this a more minor change than the others, I'm issuing it as a separate project so they can do a public notice with a 14-day comment period. I added project No. 0490340-012-AC specifically for this one issue. I duplicated the previous events in ARMS since it was part of the original request. You don't need to do anything, I just wanted you to know.

Also, they will be submitting a request for an exemption soon. Assign that to me as well.

Thanks!

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
850/921-9536