Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation

THROUGH: Jon Holtom, Title V Section

FROM: Yousry (Joe) Attalla, Title V section

DATE: April 14, 2010

SUBJECT: Draft Air Construction Permit Modification No. 0450340-014-AC (PSD-FL-344C)
Draft/Proposed Title V Air Operation Permit No. 0490340-015-AV
Seminole Electric Cooperative, Inc., Midulla Generating Station
Title V Air Operation Permit and Air Construction Permit Replacement Modification

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permits;
- Public Notice of Intent to Issue Air Permits;
- P.E. Certification.
- Draft Air Construction Permit Modification;
- Statement of Basis;
- Draft/Proposed Title V Air Operation Permit Revision;
- Settlement Stipulation dated April 12, 2010;

The draft/proposed Title V air operation permit is a revised Title V air operation permit for the Midulla Generating Station in Hardee County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance. The draft construction permit modification revises certain specific conditions of air construction permit 0490340-003-AC (PSD-FL-344) to authorize the installation of nitrogen oxide (NO_X) and carbon dioxide (CO_2) Continuous Emissions Monitoring systems (CEMS) on each Simple Cycle Combustion Turbine (SCCT). The P.E. certification briefly summarizes the proposed project.

The application was received on August 5, 2009. Day 90 is November 3rd, 2009. Settlement Stipulation dated April 13, 2010. As advised by the Southwest District Office, there are some ongoing enforcement issues at this facility, but not related to the emissions units that are being addressed by this revision.

I recommend your approval of the attached draft/proposed Title V air operation permit revision and the draft air construction permit modification.

Attachments

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

April 14, 2010

Electronic Mail – Received Receipt Requested.

Mr. Michael Opalinski, Sr. Vice President of Strategic Services
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

Re: Permit Nos. 0490340-014-AC (PSD-FL-344C) and 0490340-015-AV
Midulla Generating Station
Air Construction Permit Modification and Revised Title V Air Operation Permit

Dear Mr. Opalinski:

Enclosed is the replacement permit package for an air construction permit modification and a draft/proposed Title V air operation permit revision for the Midulla Generating Station. This existing facility is located in Hardee County, at 6695 County Road 663 in Bowling Green, Florida. The permit package includes the following documents:

- The draft air construction permit modification.
- The statement of basis, which summarizes the facility, the equipment, the primary rule applicability and details of the proposed revisions to the existing Title V air operation permit.
- The draft/proposed Title V air operation permit revision, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits provides important information regarding: the Permitting Authority's intent to issue air permits for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue air permits; the procedures for submitting comments on the draft/proposed permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Title V Air Permits must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication.

If you have any questions, please contact the Project Engineer, Yousry (Joe) Attalla, by telephone at 850-921-9527 or by email at yousry.attalla@dep.state.fl.us.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

Enclosures
TLV/jkh/yha

WRITTEN NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION AND TITLE V AIR OPERATION PERMIT REVISION

In the Matter of an
Application for an Air Construction Permit Modification and a Title V Air Operation Permit Revision by:

Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000
Responsible Official:
Mr. Michael Opalinski, Sr. Vice President of Strategic Services

Permit Nos. 0490340-014-AC (PSD-FL-344C) and 0490340-015-AV
Facility ID No. 0490340
Midulla Generating Station
Air Construction Permit Modification
Title V Air Operation Permit Revision
Hardee County, Florida

Facility Location: Seminole Electric Cooperative, Inc. operates the existing Midulla Generating Station, which is located in Hardee County at 6695 County Road 663 in Bowling Green, Florida.

Project: The purpose of this project is to issue an air construction permit modification and a Title V air operation permit revision for the above referenced facility. Details of the project are provided in the application and the enclosed Statement of Basis.

This air construction permit modification replaces the permit previously issued on November 3rd 2009 and updates specific conditions of PSD-FL-344 to authorize the installation and operation of nitrogen oxide (NO_X) and carbon dioxide (CO_2) Continuous Emissions Monitoring systems (CEMS) on each Pratt & Whitney Twin Pac simple cycle combustion turbine. These CEMS will be used to monitor and report NO_X emissions as required by both the Acid Rain Program (ARP) and Clean Air Interstate Rule (CAIR) in lieu of the current 40 CFR Part 75 Appendix E procedures and will be used to demonstrate continuous compliance with the NO_X emissions limits.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work.

Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permits, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue an air construction permit modification to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft air construction permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless

public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

The Permitting Authority also gives notice of its intent to issue a revised Title V air operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the draft air construction permit modification and the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft air construction permit or to the draft/proposed Title V air operation permit, the Permitting Authority shall revise the draft air construction permit and the draft/proposed Title V air operation permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45–day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information

regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm .

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Written Notice of Intent to Issue an Air Construction Permit Modification and a Title V Air Operation Permit Revision (including the Public Notice, the Statement of Basis, the Draft/Proposed Permits and Technical Evaluation and Preliminary Determination), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 4/16/10 to the persons listed below.

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-eletric.com)
Mr. Tom Davis, P.E., ECT, Inc. (tdavis@ectinc.com)
Mr. Mike Halpin, Siting Office (mike.halpin@dep.state.fl.us)
Ms. Cindy Zhang-Torres, Southwest District Office (cindy.zhang-torres@dep.state.fl.us)
Ms. Ana Oquendo, EPA Region 4 (ana.oquendo@epa.gov)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

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.

(Clerk) (Date) 4/16/10

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION AND TITLE V AIR OPERATION PERMIT REVISION

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit Modification No. 0490340-014-AC (PSD-FL-344C)
Draft/Proposed Title V Air Operation Permit No. 0490340-015-AV
Seminole Electric Cooperative, Inc., Midulla Generating Station
Hardee County, Florida

Applicant: The applicant for this project is Seminole Electric Cooperative, Inc. The applicant's responsible official and mailing address are: Mr. Michael Opalinski, Sr. Vice President of Strategic Services, Seminole Electric Cooperative, Inc., 16313 North Dale Mabry Highway, Tampa, Florida 33618-1427.

Facility Location: The applicant operates the existing Midulla Generating Station, which is located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. This station was formerly known as the Payne Creek Generating Station.

Project: The applicant applied on August 5, 2009 to the Department for an air construction permit modification and a concurrent Title V air operation permit revision.

The existing facility is an electrical power plant, which consists of the following emissions units and activities: two combined cycle combustion turbines, ten simple cycle combustion turbines (five twin-packs) and miscellaneous unregulated and insignificant activities. The facility is classified as a Title V major source, a Title IV acid rain source, a major stationary source subject to the Prevention of Significant Deterioration (PSD) of Air Quality, and a synthetic minor source of hazardous air pollutants.

The draft air construction permit, which revises permit No. 0490340-003-AC (PSD-FL-344) authorizes the installation and operation of nitrogen oxide (NO_X) and carbon dioxide (CO_2) Continuous Emissions Monitoring systems (CEMS) on each Simple Cycle Combustion Turbine. The CEMS will be used to monitor and report NO_X emissions as required by the Acid Rain Program (ARP) and the Clean Air Interstate Rule (CAIR) in lieu of the currently authorized 40 CFR Part 75 Appendix E procedures and will be used to demonstrate continuous compliance with the NO_X emissions limits. Seminole Electric Cooperative, Inc. plans to install and certify the NO_X and CO_2 CEMS during the first quarter of 2010.

Project No. 0490340-015-AV revises the existing Title V air operation Permit No. 0490340-006-AV to incorporate the changes proposed in Project No. 0490340-014-AC (PSD-FL-344C).

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project.

Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214, of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft air construction permit modification, the draft/proposed Title V air operation permit revision, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons

may view the draft/proposed permits by visiting the following website: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit modification to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the proposed draft air construction permit modification unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

The Permitting Authority also gives notice of its intent to issue a Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final Title V air operation permit in accordance with the conditions of the draft/proposed Title V air operation permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft air construction permit modification and the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft air construction permit or to the draft/proposed Title V air operation permit, the Permitting Authority shall revise the draft air construction permit and the draft/proposed Title V air operation permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the

following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45–day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm.

DRAFT PERMIT MODIFICATION

PERMITTEE

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

Authorized Representative:
Michael Opalinski, Sr. Vice President of Strategic Services

Permit No. 0490340-014-AC / PSD-FL-344C
Expiration Date: November 1, 2010
Minor Air Construction / PSD Permit Revision
Midulla Generating Station
Installation of NO_X and CO_2 CEMS

PROJECT

This is the final air construction permit, which revises permit No. 0490340-003-AC (PSD-FL-344) to authorize the installation of nitrogen oxide (NO_X) and carbon dioxide (CO_2) Continuous Emissions Monitoring systems (CEMS) on each Simple Cycle Combustion Turbine (SCCT). These CEMS will be used to monitor and report NO_X emissions as required by the Acid Rain Program (ARP) and the Clean Air Interstate Rule (CAIR) in lieu of the currently authorized 40 CFR Part 75 Appendix E procedures. Upon certification and operation of the NO_x CEMS, the Appendix E procedures will no longer be required. Midulla Generating Station is an existing electrical power plant (SIC No. 4911) located in Hardee County at 6697 N. County Road 663 in Bowling Green, Florida. This plant was formerly known as the Payne Creek Generating Station. The UTM coordinates are Zone 17, 405.049 km East and 3057.712 km North.

This permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, 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

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Modification) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on _____(DRAFT)_____ to the persons listed below.

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-eletric.com)
Mr. Tom Davis, P.E., ECT, Inc. (tdavis@ectinc.com)
Mr. Mike Halpin, Siting Office (mike.halpin@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)
Ms. Barbara Friday, DEP BAR (Barbara.Friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)
Ms. Vickie Gibson, DEP BAR (victoria.gibson@dep.state.fl.us) (for reading file)

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.

(DRAFT)

_____ _____
(Clerk) (Date)

FACILITY DESCRIPTION

The existing facility is an electrical power plant, which consists of the following emissions units and activities: two combined cycle combustion turbines; ten simple cycle combustion turbines (five twin-packs); and, miscellaneous unregulated and insignificant activities. The facility is classified as a Title V major source, a Title IV acid rain source, a major stationary source subject to the Prevention of Significant Deterioration (PSD) of Air Quality, and a synthetic minor source of hazardous air pollutants.

Each of the five Twin Pac simple cycle sets (CT-4A – CT-8B), Emissions Unit Nos. -005, -006, -007, -008 and -009, consists of two combustion turbines (Pratt & Whitney Model No. FT-8), two exhaust stacks and a common electrical generator. Each of the five Twin Pac systems is rated at 60 megawatts (MW) of direct power. The simple cycle units are used during periods of peak electrical demand. All units fire natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control carbon monoxide (CO) and volatile organic compound (VOC) emissions, all combustion turbines are equipped with catalytic oxidation systems. To control NO_X emissions, all units are equipped with water injection. The water-to-fuel ratio is continuously monitored and recorded for each unit. A NO_X CEMS is currently installed on one of the ten combustion turbines.

FACILITY REGULATORY CLASSIFICATION

- The facility is a synthetic minor source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROPOSED PROJECT

Seminole Electric Cooperative, Inc. (SECI) requests revisions of the Midulla Generating Station's PSD permit with respect to the Pratt & Whitney (P&W) Twin Pac SCCTs to allow for the installation of NO_X and CO_2 CEMS on each P&W SCCT. Currently, the combustion turbines utilize 40 CFR Part 75, Appendix E procedures for the purpose of satisfying the monitoring and reporting of NO_X emissions rates required by the Acid Rain program and the Clean Air Interstate Rule (CAIR). Permit No. 0490340-003-AC (PSD-FL-344) only required the installation of one NO_X CEMS on a representative stack in order to correlate actual emissions to the information obtained by the 40 CFR Part 75, Appendix E procedures. In order to more accurately record actual NO_X emissions for purposes of Acid Rain compliance and CAIR allowance tracking, SECI has elected to install NO_X CEMS on all ten of the SCCT stacks in lieu of continuing to utilize the current 40 CFR Part 75, Appendix E procedures. To satisfy the associated diluent monitoring requirements and to prepare for the upcoming monitoring requirements under the proposed greenhouse gas rule, carbon dioxide CEMS will also be installed on each of the ten stacks.

Water-to-fuel ratio monitoring is presently used to monitor and report excess NO_X emissions pursuant to New Source Performance Standard (NSPS) Subpart GG requirements. In accordance with the monitoring option described in 40 CFR 60.334(b), the SCCT NO_X and CO_2 CEMS may also be used to monitor and report excess NO_X emissions pursuant to 40 CFR 60.334(j)(iii). After the certification and operation of the NO_x CEMS, 40 CFR 75 Appendix E procedures will no longer be required for the water-to-fuel monitors. The permittee is still required to conduct water-to-fuel ratio monitoring, but this data will only be used during periods of NOx CEMS downtime as a surrogate for assuring compliance with the NOx limit. Quality-assurance of the water-to-fuel monitoring data will be provided based on a correlation of the water-to-fuel ratio to Appendix E stack testing in 2007, 2008 and 2009, and annual RATA and NOx CEMS data.

The pollutant analyzers planned for the Midulla Generating Station SCCTs are Thermo Scientific Model 42i (for NO_X) and Model 410i (for CO_2) instruments. Seminole Electric Cooperative, Inc. plans to install and certify the NO_X and CO_2 CEMS during the ~~first quarter~~middle of 2010.

To recognize the change in the methods of monitoring emissions and to authorize the installation of the NO_X and CO_2 CEMS, the following permit conditions related to the five Pratt & Whitney Twin Pac simple cycle combustion turbine sets are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. Affected Emissions Units: Five Twin Pac Simple Cycle Combustion Turbine Sets, Emissions Unit Nos. -005, -006, -007, -008 and -009.

Permit Being Modified: Permit No. 0490340-003-AC (PSD-FL-344).

1. Other Permits. Except as specified below, the conditions of this permit revision are in addition to all other valid permits in effect for this facility.

2. Installation of CEMS. This permit authorizes the installation of NO_X and CO_2 CEMS for monitoring purpose and for continuous compliance with the NO_X emissions limits. Pursuant to 40 CFR 60.334(b), each CEMS must be installed and certified according to PS 2 and 3 (for diluent) of 40 CFR Part 60, Appendix B. [40 CFR 60.334; Rule 62-4.070, F.A.C.; and, Applicant Request.]

3. Continuous NO_X Compliance. To recognize the use of the new NO_X CEMS for continuous compliance and emissions monitoring, Specific Condition 17 is changed as follows:

   17. Nitrogen Oxides (NO_X) as determined by NO_X CEMS:
   (g) The permittee shall demonstrate compliance with this standard by conducting performance tests, emissions monitoring and continuous water-to-fuel ratio monitoring in accordance with 40 CFR Part 60 Subpart GG, as well as all other conditions of this permit. The NO_X CEMS shall be used to demonstrate continuous compliance with the NO_X limits. Data shall be maintained to correlate the NO_X CEMS results to the water-to-fuel ratio monitoring results. During periods of monitor downtime of the NO_X CEMS, the water-to-fuel ratio monitors shall serve as a surrogate for assuring compliance with the NO_X limits.

4. Reporting of Excess Emissions. To recognize the use of the NO_X CEMS for reporting excess emissions, Specific Condition 20(b) is changed as follows:

   20. Excess Emissions Allowed: Providing the permittee adheres to best operational practices to minimize the amount and duration of excess emissions, the following conditions shall apply:
   (b) During all startups, shutdowns, and malfunctions, the continuous emissions monitor (water-to-fuel ratio or NO_X CEMS) shall monitor and record emissions. However, up to 2 hours of monitoring data during any 24-hour period may be excluded from continuous compliance demonstrations as a result of startups, shutdowns, and documented malfunctions. A documented malfunction means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile, or electronic mail. In case of malfunctions, the permittee shall notify the Compliance Authorities within one working day. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Design; Rules 62-210.700(1), (5), and 62-4.130, F.A.C.; and, 40 CFR 60.334(j)(iii)]

5. Annual Performance Test: The permittee has elected to install a NO_X CEMS and is no longer relying on the Twin Pac units' status as Low Mass Emission (LME) units; therefore Specific Condition 25.(b) has been deleted as follows:

   ~~b) For purposes of demonstrating ongoing qualification as Low Mass Emission (LME) Units, the permittee shall comply with the procedures outlined in 40 CFR 75.19.~~

6. Use of NO_X CEMS for Continuous Compliance. To recognize the applicant's request to install and use NO_X CEMS for continuous compliance instead of continuing to follow the procedures contained in Appendix E of 40 CFR 75, Specific Condition 33. is changed as follows:

33. NO_X CEMS: ~~The combustion turbines qualify as Low Mass Emission (LME) Units for the purposes of Acid Rain. Accordingly, the permittee has indicated that these emissions units will follow the procedures outlined in 40 CFR 75.19 in lieu of NO_X CEMS. However, should the permittee elect or be otherwise required to install NO_X CEMS, such NO_X monitoring devices shall comply with the requirements of 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems.~~ Permittee has elected to install NO_X CEMS for each simple cycle combustion turbine. Each CEMS shall be installed, operated, and maintained to monitor NO_X emissions and a diluent gas (carbon dioxide) in accordance with applicable provisions in 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems. A monitoring plans shall be provided to the Department's Emissions Monitoring Section Administrator, EPA Region 4, and the Compliance Authority for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62. The plan shall consist of data on CEM equipment specifications, manufacturer, type, calibration, and maintenance needs, and in its proposed location. A monitor for carbon dioxide may be used in place of the oxygen monitor, but the system shall be capable of correcting the emissions to 15% oxygen. [Rule 62-212.400, F.A.C., ~~and~~ 40 CFR 75, and 40 CFR 60, Subpart GG]

7. Use of NO_X CEMS In Lieu of Water-To-Fuel Monitor. To establish the use of the NO_X CEMS for purposes of continuous compliance and for the reporting of excess emissions in lieu of the water-to-fuel monitors, Specific Condition 34. is changed as follows:

34. Water-to-fuel ratio: Each Twin Pac shall be fitted with continuous water-to-fuel ratio monitoring equipment~~, as per 40 CFR 75 Appendix E. Appendix E is an alternative monitoring protocol that may be used by oil and gas-fired peaking units in lieu of installing a CEMS to measure NO_x emissions.~~ The fuel flow meters shall be maintained in accordance with 40 CFR 75 Appendix D. Hourly NO_X emissions (lbs for natural gas, ppm for oil) derived from the water-to-fuel monitors shall be correlated to the results of a series of stack tests conducted in accordance with Appendix E procedures during 2007, 2008 and 2009 based on the heat input to the unit at various water-to-fuel injection ratios. Hourly NOx emissions derived from the water-to-fuel monitors shall also be quality-assured via correlation to the results of the annual RATA and continuous CEMS data. Based upon the measured water-to-fuel ratio, and the measured heat input for each fuel, the actual NO_X emissions shall be calculated, and used for purposes of compliance during periods of NOx CEMS downtime. ~~With the appropriate load selection, the Subpart GG performance testing may also be utilized to satisfy the NO_x-to-heat input correlation testing requirements of Appendix E. Retesting of Appendix E NO_x-to-heat input correlation for each combustion turbine shall be required annually, except as provided for within Specific Condition 25 of this permit. The permittee shall solicit a list from the turbine manufacturer of at least four operating parameters (indicative of NO_x formation) with acceptable ranges to serve as QA/QC parameters as per Appendix E. The manufacturer-supplied ranges for the parameters, shall be used on an hourly basis to establish that the unit is being operated in a normal fashion and, therefore, that the NO_x-to-heat input correlation (by fuel type) can be used with validity. As a further means of ensuring the validity of the Appendix E protocol for determining NO_x emissions, one~~All of the five Twin Pacs shall be fitted with a NO_X CEMS. The NO_X CEMS ~~which is installed solely for this purpose (rather than one of the purposes outlined in Specific Condition 33 above)~~ shall ~~not~~ be the compliance method~~, but shall be utilized for the purpose of ensuring that the Appendix E protocol is being properly applied~~. The permittee shall maintain records of the a~~A~~nnual data (obtained from the above required testing) ~~shall be provided to the Department~~ correlating the CEMS indication to the water-to-fuel~~Appendix E~~ indication. During periods of NOx CEMS monitor downtime, the water-to-fuel ratio ~~monitors and the Appendix E procedures~~ shall be used to demonstrate compliance with the NO_X limits. [62-4.070, F.A.C. and Applicant request]

8. CEMS Installation, Quality Assurance and Operation. The CO_2 and NO_X CEMS shall be installed, quality assured and operated in accordance with the requirements of 40 CFR 60 Appendix B and F (or 40 CFR 75). [62-4.070, F.A.C.]

9. Notification of Installation. Within 30 days of completion of the installation, Quality Assurance and Certification of the of the NO_X and CO_2 CEMS, the permittee shall provide a notification to the compliance office documenting the date that compliance with the NO_X limits began to be continuously demonstrated by the CEMS instead of the water-to-fuel ratio monitors and the Appendix E procedures. [Rules 62-4.070 and 62-297.310(8), F.A.C.]

Seminole Electric Cooperative, Inc. – Midulla Generating Station
Title V Air Operation Permit Revision
Permit No. 0490340-015-AV

APPLICANT

The applicant for this project is Seminole Electric Cooperative, Inc. The applicant's responsible official and mailing address are: Mr. Michael Opalinski, Sr. Vice President of Strategic Services, Seminole Electric Cooperative, Inc., Midulla Generating Station, 16313 North Dale Mabry Highway, Tampa, Florida 33618-1427.

FACILITY DESCRIPTION

The applicant operates the existing Midulla Generating Station, which is located in Hardee County at 6697 N. County Road 663, Bowling Green, Florida.

The facility is an existing power plant consisting of two combined cycle combustion turbines, ten simple cycle combustion turbines and miscellaneous unregulated and insignificant activities. The facility is classified as a Title V major source, a Title IV acid rain source, a major stationary source subject to the Prevention of Significant Deterioration (PSD) of Air Quality, and a synthetic minor source of hazardous air pollutants.

Combined Cycle Units. The combined cycle system consists of two combustion turbines, two heat recovery steam generators (HRSG), two exhaust stacks and common steam turbine-electrical generator. Without a bypass stack, each combustion turbine operates in combined cycle mode to generate 157.5 megawatts (MW) of direct power. Each HRSG recovers energy from the combustion turbine exhaust to provide steam to the shared steam turbine-electrical generator and produce an additional 173 MW of steam-generated power. The combined cycle combustion turbines are base loaded units. Each unit fires natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control carbon monoxide (CO) and volatile organic compound (VOC) emissions, each unit is equipped with a catalytic oxidation system. To control nitrogen oxides (NO_X) emissions, each unit is equipped with dry low-NO_X combustion technology and selective catalytic reduction (SCR) for firing natural gas, and wet injection for firing distillate oil. The water-to-fuel ratio is continuously monitored and recorded for each unit. Pursuant to the federal Acid Rain program, each unit monitors NO_X emissions with a continuous emissions monitoring system (CEMS). A Compliance Assurance Monitoring (CAM) plan is not required for the SCR and water injection systems because compliance is determined by NO_X CEMS. A CAM plan is required for the catalytic oxidation systems, which control CO and VOC emissions.

Simple Cycle Units. Each simple cycle system is known as a Twin Pac and consists of two combustion turbines, two exhaust stacks and common electrical generator. Each of the five Twin Pac systems is rated at 60 MW of direct power. The simple cycle units are used during periods of peak electrical demand. All units fire natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control CO and VOC emissions, all combustion turbines are equipped with catalytic oxidation systems. To control NO_X emissions for both natural gas and distillate oil firing, all units are equipped with water injection. The water-to-fuel ratio is continuously monitored and recorded for each unit. A NO_X CEMS will be installed on all of the ten combustion turbines during the middle of 2010, and upon certification, shall be used to demonstrate compliance. During periods of NOx CEMS downtime, the water-to-fuel ratio shall serve as a surrogate for assuring compliance with the NOx limits. After certification and operation of the NOx CEMS, the 40 CFR 75 Appendix E procedures will no longer be required for the water-to-fuel monitors. Quality-assurance of the water-to-fuel monitoring data will be provided based on a correlation of the water-to-fuel ratio to Appendix E stack testing in 2007, 2008 and 2009, and annual RATA and NOx CEMS data. A CAM plan is not required for the water injection systems because compliance is determined continuously by NO_X CEMS. A CAM plan is not required for the catalytic oxidation systems because CO and VOC emissions are less than 100 tons/year/unit.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to incorporate with 0490340-014-AC as described in the Project Review Section below.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit Renewal effective January 1, 2008.
1st Title V Air Operation Permit Revision issued February 26, 2009.
2nd Title V Air Operation Permit Revision issued March 27, 2009.
Application for a Title V Air Operation Permit Revision received August 5, 2009.
Draft/Proposed Title V Air Operation Permit Revision issued November 3, 2009.
Comments received from applicant on December 28, 2009.
Draft/Proposed Title V Air Operation Permit Revision issued January XX, 2010.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a synthetic minor source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: Units 1 and 2 were originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility due to the use of NO_X CEMS for continuous compliance.

PROJECT REVIEW

This Title V Air Operation Permit Revision incorporates the specific conditions of permit No. 0490340-014-AC (PSD-FL-344C) for the installation of NO_X and CO_2 Continuous Emissions Monitoring systems (CEMS) on each Pratt & Whitney Twin Pac simple cycle combustion turbines, EU Nos. from -005 to -009. These CEMS will be used to monitor and report NO_X emissions as required by the Acid Rain Program (ARP) and the Clean Air Interstate Rule (CAIR) in lieu of the current 40 CFR Part 75 Appendix E procedures.

To reflect the changes made in permit No. 0490340-014-AC (PSD-FL-344C) and to correct Specific Condition **B.11.** of the Title V permit in order to reflect Specific Condition 17 of permit No. 0490340-003-AC (PSD-FL-344), the following conditions of the Title V permit have been changed. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

This section addresses the following emissions units.

EU No.	Brief Description
-005 through -009	Five Twin Pac simple cycle sets (CT-4A – CT-8B) consisting of two combustion turbines (Pratt & Whitney Model No. FT-8), two exhaust stacks and common electrical generator. Each of the five Twin Pac systems is rated at 60 MW of direct power. The simple cycle units are used during periods of peak electrical demand. All units fire natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control CO and VOC emissions, all combustion turbines

	are equipped with catalytic oxidation systems. To control NO_X emissions, all units are equipped with water injection. The water-to-fuel ratio is continuously monitored and recorded for each unit. A NO_X and CO_2 CEMS ~~is~~ will be installed on ~~one of the~~ all ten combustion turbines in 2010.

~~**B.11.** NO_X Standards.~~

~~a. As determined by EPA Method 7E or 20, NO_X emissions from each combustion turbine shall not exceed 42 ppmvd while firing distillate oil. The compliance averaging time shall be the sampling period specified by the applicable compliance method.~~

~~b. NO_X emissions from each Twin Pac system shall not exceed a 64 lb/hr averaged over any calendar month while firing natural gas.~~

~~c. During the initial twelve calendar months of operation, NO_X emissions from each Twin Pac while firing natural gas shall not exceed a total of 102,000 pounds.~~

~~d. NO_X emissions from each Twin Pac system shall not exceed 102,000 pounds during any rolling 12 calendar month period while firing natural gas in accordance with the NO_X compliance spreadsheet in Appendix CS (equivalent to 20 ppm at full load for 2000 hours per year). If NO_X emissions from a Twin Pac system exceed 102,000 pounds during any rolling 12 calendar month period from firing natural gas, the corresponding limitation on hours of operation shall apply to that Twin Pac system for the next calendar month of actual operation. The limitation on hours of operation shall be calculated in accordance with the compliance spreadsheet in Appendix CS and will yield an equivalent and off-setting NO_X reduction for the next calendar month of actual operation. The adjustment on the limitation on hours of operation will ensure a "truing up" of NO_X emissions on a monthly basis. During the next calendar month of actual operation, any hours operated in excess of the calculated limitation on hours of operation ("available hours") shall represent a violation of this permit.~~

~~e. If actual NO_X emissions from a Twin Pac system are less than 102,000 pounds during any rolling 12 calendar month period, it shall be permissible for that Twin Pac system to continue to operate on natural gas beyond the limitation specified in Condition B.4. (2000 hours on natural gas during any rolling 12 calendar months) provided that:~~

~~1. NO_X emissions from firing natural gas does not exceed 102,000 pounds during the rolling 12 calendar month period, and~~

~~2. The allowable hours of oil firing for the Twin Pac system specified in Condition B.4. (500 hours during any rolling 12 calendar months) shall be reduced by one hour for each hour of additional gas firing. In no case shall a Twin Pac operate more than 2500 total hours during any rolling 12 calendar month period.~~

~~f. The attached compliance spreadsheet in Appendix CS shall be used to calculate actual NO_X emissions.~~

~~g. The permittee shall demonstrate compliance with these standards by conducting performance tests, emissions monitoring and continuous water-to-fuel ratio monitoring in accordance with 40 CFR Part 60 Subpart GG, as well as all other conditions of this permit.~~

~~{Permitting Note: The NO_X emission limit established as BACT is equivalent to 20 ppmvd corrected to 15% oxygen based on 2000 hours per year of natural gas operation.} [PSD-FL-344B and Rule 62-212.400(PSD), F.A.C.]~~

B.11. NO_X Standards. As determined by NO_X CEMS:

a. NO_X emissions from each Twin Pac while firing gas shall be controlled to achieve an equivalent of 20 ppm at full load for 2,000 hours per year, which equates to 102,000 lbs over a rolling 12 calendar month period while firing natural gas as per the attached compliance spreadsheet, attachment and incorporated herein as a part of this permit as attachment CS. In the event that during any rolling 12 calendar month period, the NO_X emissions while firing natural gas are in excess of 102,000 lbs, a corresponding "hours limitation" shall apply to that Twin Pac unit for the next calendar month of actual operation. The hours limitation shall be calculated in accordance with attachment CS and will yield an equivalent and off-

setting NO_X reduction for the next calendar month of actual operation. This hours limitation adjustment will ensure a truing up of NO_X emissions on a monthly basis. During the next calendar month of actual operation, any hours operated in excess of the calculated hours limitation ("available hours") shall represent a violation of this permit.

b. NO_X emissions from each Twin Pac shall not exceed a 64 lb/hr average over any calendar month while firing natural gas.

c. During any 12 calendar month rolling average period, should the actual NO_X emissions for a Twin Pac unit total less than 102,000 lbs, it shall be permissible for that Twin Pac unit to fire an additional amount of natural gas (over the 2,000 hours limitation in Specific Condition **B.4.**) provided that:
(1) The 12-month rolling average of 102,000 lbs of NO_X for natural gas firing is not exceeded, and
(2) The allowable hours of oil firing (500 hours per Twin Pac per 12 month period) shall be reduced by one hour for each hour of additional gas firing. In no circumstance shall it be permissible for a Twin Pac to operate over 2,500 total hours during any 12 month period.

d. NO_X emissions from each combustion turbine shall not exceed 42 ppmvd while firing fuel oil. The compliance averaging time shall be the sampling period specified by the applicable compliance method.

e. During the initial twelve calendar months of operation, NO_X emissions while firing natural gas shall not exceed 102,000 lbs per Twin Pac, nor 64 lb/hr averaged over any calendar month.

f. Compliance with the standard specified herein shall satisfy the NSPS and BACT requirements.

g. The permittee shall demonstrate compliance with this standard by conducting performance tests, emissions monitoring and continuous water-to-fuel ratio monitoring in accordance with 40 CFR Part 60 Subpart GG, as well as all other conditions of this permit. Upon certification, t~~T~~he NO_X CEMS shall be used to demonstrate continuous compliance with the NO_X limits. Data shall be maintained to correlate the NOx CEMS results to the water-to-fuel monitoring results (see Condition B.23.). During peri~~i~~ods of monitor downtime of the NOx CEMS, the water-to-fuel ratio monitors shall serve as a surrogate for assuring compliance with the NO_X limits.

h. The attached Compliance Spreadsheet shall be used to calculate NO_X emissions, in accordance with Specific Condition **B.23.**

[PSD-FL-344B and Rule 62-212.400(PSD), F.A.C.]

B.15. Excess Emissions Allowed. Providing the permittee adheres to best operational practices to minimize the amount and duration of excess emissions, the following conditions shall apply:

a. During startup and shutdown, visible emissions excluding water vapor shall not exceed 20% opacity for more than 2 hours in any 24-hour period.

b. During all startups, shutdowns, and malfunctions, the continuous emissions monitors (water-to-fuel ratio monitor ~~and~~ or NO_X CEMS) shall monitor and record emissions. However, up to 2 hours of monitoring data during any 24-hour period may be excluded from the continuous compliance demonstrations as a result of startups, shutdowns, and documented malfunctions. A documented malfunction means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile, or electronic mail. In case of malfunctions, the permittee shall notify the Compliance Authorities within one working day. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[~~PSD-FL-344B and~~ 40 CFR 60.334(j)(iii); Rules 62-4.130, 62-210.700(1) & (5) ~~and 62-4.130~~, F.A.C.; and, Permit Nos. PSD-FL-344B & 0490340-014-AC (PSD-FL-344C)]

B.17. Annual Performance Tests.

~~e. For purposes of demonstrating ongoing qualification as Low Mass Emission (LME) Units under the federal Acid Rain program, the permittee shall comply with the procedures outlined in 40 CFR 75.19.~~

B.22. ~~The combustion turbines qualify as Low Mass Emission (LME) Units for the purposes of Acid Rain. Accordingly, the permittee has indicated that these emissions units will follow the procedures outlined in 40 CFR 75.19 in lieu of NO_x CEMS. However, should the permittee elect or be otherwise required~~ The permittee has elected to install NO_X CEMS, for demonstrating continuous compliance with the NO_X limits. These ~~such~~ NO_X monitoring devices will be installed during the middle of 2010 and shall comply with the requirements of 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems. A monitoring plan shall be provided to the Department's Emissions Monitoring Section Administrator, EPA Region 4, and the Compliance Authority for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62. The plan shall consist of data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location. A monitor for carbon dioxide may be used in place of the oxygen monitor, but the system shall be capable of correcting the emissions to 15% oxygen. [PSD-FL-344B, 0490340-014-AC (PSD-FL-344C), Rule 62-212.400, F.A.C. and 40 CFR 75]

B.23. Each Twin Pac shall be fitted with continuous water-to-fuel ratio monitoring equipment~~, as per 40 CFR 75 Appendix E. Appendix E is an alternative monitoring protocol that may be used by oil and gas-fired peaking units in lieu of installing a CEMS to measure NO_x emissions.~~ The fuel flowmeters shall be maintained in accordance with 40 CFR 75 Appendix D. Hourly NO_X emissions (lbs for natural gas, ppm for oil) derived from the water-to-fuel monitors shall be correlated to the results of a series of stack tests conducted in accordance with Appendix E procedures during 2007, 2008 and 2009 based on the heat input to the unit at various water-to-fuel injection ratios. Hourly NOx emissions derived from the water-to-fuel monitors shall also be quality-assured via correlation to the results of the annual RATA and continuous CEMS data. Based upon the measured water-to-fuel ratio, and the measured heat input for each fuel, the actual NO_X emissions shall be calculated, and used for purposes of compliance during periods of NOx CEMS downtime. ~~With the appropriate load selection, the Subpart GG performance testing may also be utilized to satisfy the NO_x-to-heat input correlation testing requirements of Appendix E. Retesting of Appendix E NO_x-to-heat input correlation for each combustion turbine shall be required annually, except as provided for within Specific Condition 25 of this permit. The permittee shall solicit a list from the turbine manufacturer of at least four operating parameters (indicative of NO_x formation) with acceptable ranges to serve as QA/QC parameters as per Appendix E. The manufacturer supplied ranges for the parameters, shall be used on an hourly basis to establish that the unit is being operated in a normal fashion and, therefore, that the NO_x-to-heat input correlation (by fuel type) can be used with validity. As a further means of ensuring the validity of the Appendix E protocol for determining NO_x emissions, one~~All of the five Twin Pacs shall be fitted with a NO_X CEMS. The NO_X CEMS ~~which is installed solely for this purpose (rather than one of the purposes outlined in Specific Condition 33 above)~~ shall ~~not~~ be the compliance method~~, but shall be utilized for the purpose of ensuring that the Appendix E protocol is being properly applied~~. The permittee shall maintain records of annual~~Annual~~ data (obtained from the above required testing) ~~shall be provided to the Department~~ correlating the CEMS indication to the water-to-fuel~~Appendix E~~ indication. During periods of NO_X CEMS monitor downtime, the water-to-fuel ratio ~~monitors and the Appendix E procedures~~ shall be used to demonstrate compliance with the NO_X limits. [62-4.070, F.A.C., PSD-FL-344B and 0490340-014-AC (PSD-FL-344C)]

B.24. CEMS Installation, Quality Assurance and Operation. The CO_2 and NO_X CEMS shall be installed, quality assured and operated in accordance with the requirements of 40 CFR 60 Appendix B and F (or 40 CFR 75). [0490340-014-AC (PSD-FL-344C)]

Due to the insertion of the above new Specific Condition **B.24.**, the existing Specific Conditions **B.24. – B.29.** have been renumbered to **B.25. – B.30.**

CONCLUSION

This project is the third revision to Title V air operation permit No. 0490340-006-AV, which was effective on January 1, 2008. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, 62-213 and 214, F.A.C.

TITLE V AIR OPERATION PERMIT REVISION

Draft/Proposed Permit No. 0490340-015-AV
(3rd Revision to Permit No. 0490340-006-AV)

Permittee

Seminole Electric Cooperative, Inc.
Midulla Generating Station
(Formerly the Payne Creek Generating Station)
Facility ID No. 0490340
Hardee County, Florida

Permitting Authority

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
2600 Blair Stone Road, Mail Station #5505
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

Compliance Authority

Florida Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813/632-7600

TABLE OF CONTENTS

DRAFT/PROPOSED PERMIT REVISION

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

Permit No. 0490340-015-AV
Midulla Generating Station
Facility ID No. 0490340
SIC No. 4911

Responsible Official:
Michael Opalinski, Sr. Vice President of Strategic Services

This project revises Title V air operation permit 0490340-006-AV for the Midulla Generating Station, which is an existing electrical power plant located at 6697 N. County Road 663, Bowling Green, Florida, Hardee County. This revision incorporates previously issued Permit No. 0490340-012-AC and concurrent revision Permit No. 0490340-010-AC. The map coordinates are: Zone 17, 405 km East and 3057.7 km North. This plant was formerly known as the Payne Creek Generating Station.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

0490340-006-AV Effective Date: January 1, 2008
0490340-009-AV Revision Effective Date: February 26, 2009
0490340-011-AV Revision Effective Date: March 27, 2009
0490340-015-AV Revision Effective Date: MM/DD/YYYY
Renewal Application Due Date: May 20, 2012
Expiration Date: December 31, 2012

(Draft/Proposed)

Joseph Kahn, Director
Division of Air Resource Management

JK/tlv/jh/yha

SUBSECTION A. FACILITY DESCRIPTION

The facility is an existing power plant consisting of two combined cycle combustion turbines, ten simple cycle combustion turbines and miscellaneous unregulated and insignificant activities. The facility is classified as a Title V major source, a Title IV acid rain source, a major stationary source subject to the Prevention of Significant Deterioration (PSD) of Air Quality, and a synthetic minor source of hazardous air pollutants.

Combined Cycle Units

The combined cycle system consists of two combustion turbines, two heat recovery steam generators (HRSG), two exhaust stacks and common steam turbine-electrical generator. Without a bypass stack, each combustion turbine operates in combined cycle mode to generate 157.5 megawatts (MW) of direct power. Each HRSG recovers energy from the combustion turbine exhaust to provide steam to the shared steam turbine-electrical generator and produce an additional 173 MW of steam-generated power. The combined cycle combustion turbines are base loaded units. Each unit fires natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control carbon monoxide (CO) and volatile organic compound (VOC) emissions, each unit is equipped with a catalytic oxidation system. To control nitrogen oxides (NO_X) emissions, each unit is equipped with dry low-NO_X combustion technology and selective catalytic reduction (SCR) for firing natural gas, and wet injection for firing distillate oil. The water-to-fuel ratio is continuously monitored and recorded for each unit. Pursuant to the federal Acid Rain program, each unit monitors NO_X emissions with a continuous emissions monitoring system (CEMS). A Compliance Assurance Monitoring (CAM) plan is not required for the SCR and water injection systems because compliance is determined by NO_X CEMS. A CAM plan is required for the catalytic oxidation systems, which control CO and VOC emissions.

Simple Cycle Units

Each simple cycle system is known as a Twin Pac and consists of two combustion turbines, two exhaust stacks and common electrical generator. Each of the five Twin Pac systems is rated at 60 MW of direct power. The simple cycle units are used during periods of peak electrical demand. All units fire natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control CO and VOC emissions, all combustion turbines are equipped with catalytic oxidation systems. To control NO_X emissions for both natural gas and distillate oil firing, all units are equipped with water injection. The water-to-fuel ratio is continuously monitored and recorded for each unit. A NO_X and CO_2 CEMS ~~is~~ will be installed on ~~one of the~~ all ten combustion turbines during the middle of 2010. A CAM plan is not required for the water injection systems, because each unit monitors NO_X emissions with a CEMS for continuous compliance. ~~because compliance is determined by calculating NO_X emissions based on data from the continuous water-to-fuel monitoring system.~~ A CAM plan is not required for the catalytic oxidation systems because CO and VOC emissions are less than 100 tons/year/unit.

SUBSECTION B. SUMMARY OF EMISSIONS UNITS

EU No.	Brief Description
Regulated Emissions Units	
001	Combined cycle Unit 1
002	Combined cycle Unit 2
005 - 009	Five Twin Pac simple cycle sets (CT-4A – CT-8B)
Unregulated Emissions Units and Activities	
003	One or more emergency generators
004	One or more heating units and general purpose internal combustion engines

1. Appendices. The appendices identified in the table of contents are attached as an enforceable part of this permit unless otherwise indicated.

2. Compliance Authority. The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Southwest District Office: Department of Environmental Protection, Southwest District Office, 13051 N. Telecom Parkway, Tampa, Florida 33637-0926, Telephone: 813/632-7600.

3. Prevention of Accidental Releases.

a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 1515, Lanham-Seabrook, MD 20703-1515, Telephone: 301/429-5018.

b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by Department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA. Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to: Department of Community Affairs, Division of Emergency Management, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2100, Telephone: 850/413-9921, Fax: 850/488-1739.

The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C. Send the required annual registration fee using approved forms made payable to: Cashier, Department of Community Affairs, State Emergency Response Commission, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2149.

c. Any required reports to be sent to the National Response Center, should be sent to: National Response Center, EPA Office of Solid Waste and Emergency Response, USEPA (5305 W), 401 M Street, SW, Washington, D.C. 20460, Telephone: 1/800/424-8802.

[Part IV, Chapter 252, F.S.; and, Rule 9G-21, F.A.C.]

4. Day 1 for Reports. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines "day one". [Rule 62-213.440, F.A.C.]

5. EPA Region 4. Any reports, data, notifications, certifications, and requests required to be sent to Region 4 of the U.S. Environmental Protection Agency should be sent to: U.S. Environmental Protection Agency, Region 4; Air, Pesticides & Toxics Management Division; Air and EPCRA Enforcement Branch, Air Enforcement Section; 61 Forsyth Street; Atlanta, Georgia 30303-8960; Telephone No. 404/562-9155; and Facsimile No. 404/562-9163.

6. Certification by Responsible Official. In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

EU No.	Brief Description
001 and 002	Combined cycle Units 1 and 2 form a combined cycle system consisting of two combustion turbines (Siemens Westinghouse Model No. 501FD), two HRSG, two exhaust stacks and common steam turbine-electrical generator. Without a bypass stack, each combustion turbine operates only in combined cycle mode to generate 157.5 MW of direct power. Each HRSG recovers energy from the combustion turbine exhaust to provide steam to the shared steam turbine-electrical generator and produce an additional 173 MW of steam-generated power. The combined cycle combustion turbines are base loaded units. Each unit fires natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control CO and VOC emissions, each unit is equipped with a catalytic oxidation system. To control NO_X emissions, each unit is equipped with dry low-NO_X combustion technology and SCR for firing natural gas, and wet injection for firing distillate oil. The water-to-fuel ratio is continuously monitored and recorded for each unit. Pursuant to the federal Acid Rain program, each unit monitors NO_X emissions with a CEMS. The units began operation in December of 2001.

{Permitting Note: The emissions units are regulated under: Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) of Air Quality and Best Available Control Technology (BACT); Subpart GG in 40 CFR 60, Standards of Performance for Stationary Gas Turbines; and Phase II of the federal Acid Rain program.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1. Permitted Capacity. At an ambient temperature of 32° F, the maximum heat input rate to each combustion turbine shall neither exceed 1962 million Btu per hour (MMBtu/hour) while firing natural gas nor 1888 MMBtu/hour while firing distillate oil. Heat input rates will vary depending on gas turbine characteristics, ambient conditions, and alternate methods of operation. [PSD-FL-214E and Rules 62-4.160(2), 62-210.200(PTE) and 62-212.400(PSD), F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix D. [Rule 62-297.310(2), F.A.C.]

A.3. Authorized Fuels. The emissions units are authorized to fire the following fuels.

a. Natural gas is fired as the primary fuel.

b. Distillate oil with a maximum sulfur content of 0.05% by weight is only fired as a backup fuel and shall not exceed 41,751,000 gallons per year not to exceed 3000 hours per year between the two combustion turbines, which is equivalent to 1500 hours per year per combustion turbine of operation at full load.

[PSD-FL-214E and Rule 62-212.400(PSD), F.A.C.]

A.4. Hours of Operation. These emissions units may operate continuously (8760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

EMISSION LIMITATIONS AND STANDARDS

A.5. Maximum Allowable Emissions Limitations. The maximum allowable emission limitations from the combustion turbines when firing natural gas or distillate oil shall not exceed the following.

Pollutant	Fuel	Concentration	One Unit lb/hour [a]	Two Units tons/year [b]	Two Units [c] tons/year
NO_x	Gas	9 ppmvd [d]	68	596	906
	Oil	42 ppmvd [e]	336	504	

Pollutant	Fuel	Concentration	One Unit lb/hour [a]	Two Units tons/year [b]	Two Units [c] tons/year
CO	Gas	20 ppmvd	71	622	618
	Oil	25 ppmvd	91	136	
PM/PM_{10}	Gas	Compliance with the mass emissions limits shall be demonstrated with initial tests only. Thereafter, compliance with the fuel sulfur specifications of this permit shall serve as a surrogate for compliance with the emissions limits.	7	65	147
	Oil		67	100	
SO_2	Gas	SO_2 emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SO_2 mass emissions rates shown are estimated maximum emissions.	5	47	182
	Oil		101	152	
VOC	Gas	5 ppmvd	10	88	99
	Oil	10 ppmvd	21	31	
Sulfuric Acid Mist (SAM)	Gas	SAM emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SAM mass emissions rates shown are estimated maximum emissions.	1	6	39
	Oil		22	34	

a. The hourly emissions limitations are in lb/hour/unit based on a 1-hour average as determined by the applicable performance tests. The emission calculations are also based on a compressor inlet temperature of 32° F.

b. The annual emission limitations for natural gas are based on both units operating at full load for 8760 hours per year. The annual emission limitations for distillate oil are based on both units operating at full load for 1500 hours per year per unit not to exceed 3000 hours per year between the two units. The emission calculations are also based on a compressor inlet temperature of 32° F.

c. This represents the maximum allowable emissions from two units based on: both units operating at full load; 1500 hours/year/unit of distillate oil firing; 7260 hours/year/unit of natural gas firing; and a compressor inlet temperature of 59°F.

d. The allowable NO_X emission limitation when firing natural gas of 9 ppmvd is corrected to 15% oxygen based on CEMS data.

e. The allowable NO_X emission limitation when firing distillate oil of 42 ppmvd is corrected to 15% oxygen based on CEMS data.

[Rule 62-212.400(PSD), F.A.C. and PSD-FL-214E]

A.6. Ammonia Slip. Ammonia slip from the SCR system shall not exceed 10 ppm. [PSD-FL-214E and Rule 62-212.400(PSD), F.A.C.]

A.7. Sulfur Dioxide and Sulfuric Acid Mist. Sulfur dioxide and sulfuric acid mist emissions shall be limited by firing natural gas and distillate oil with a maximum sulfur content of 0.05% by weight. [PSD-FL-214E and Rule 62-212.400(PSD), F.A.C.]

A.8. Visible Emissions. Visible emissions shall not exceed 10% opacity when firing natural gas or distillate oil. [PSD-FL-214E and Rule 62-212.400(PSD), F.A.C.]

EXCESS EMISSIONS

A.9. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided:

a. Best operational practices to minimize emissions are adhered to, and

b. The duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period except for the following specific cases:

1. For cold startups, excess emissions from any unit shall not exceed six hours in any 24-hour period. "Cold startup" is defined as a startup following a shutdown of 48 hours or more.

2. For hot and warm startups, excess emissions from any unit shall not exceed two hours per startup event and no more than three startup events in any 24-hour period. "Hot and warm startup" is defined as a startup following a shutdown of less than 48 hours.

3. For shutdowns, excess emissions from any unit shall not exceed two hours per shutdown event and no more than three shutdown events in any 24-hour period.

4. The permittee shall include the excess NO_X emissions data in determining compliance with the annual facility-wide emission cap of 906 tons per year. All quality-assured hourly NO_X emissions data shall be used when demonstrating compliance with the emissions cap. When monitoring data is not available, substitution for missing data shall be handled as required by 40 CFR 75.

5. Excess emissions from fuel switching shall not exceed 15 minutes per event.

6. Excess emissions due to fuel bound nitrogen levels above 0.015% by weight are allowed pursuant to Condition A.5.

For purposes of the reports required under this permit, excess emissions for this condition are defined as any calculated average emission rate which exceeds the applicable emission limitation in Condition A.5. Rule 62-210.700(Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision. See also Appendix C (Common Conditions) for additional conditions that may be applicable regarding excess emissions. [PSD-FL-214E and Rules 62-210.700(1) & (5) and 62-212.400(PSD), F.A.C.]

MONITORING OF OPERATIONS

A.10. Monitoring of Water-to-Fuel Ratio. The permittee shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water-to-fuel being fired in the turbine. This system shall be accurate to within 5%. The NO_X CEMS may be used to satisfy this requirement. [PSD-FL-214E, Rule 62-212.400(PSD) and 40 CFR 60.334(a)]

A.11. Fuel Sulfur Monitoring.

a. Distillate Oil: The fuel sulfur content shall be determined on each occasion that distillate oil is transferred to the storage tank from any other source. A vendor analysis of the distillate oil "as received" will satisfy this requirement. Alternatively, if the distillate oil storage tank is isolated from the combustion turbines while being filled, the sulfur content of the tank may be determined after the tank is filled and before it is placed back into service.

b. Natural Gas: The permittee shall obtain a monthly report from the vendor indicating the sulfur content of the natural gas being supplied from the pipeline for each month of operation. The chromatograph data posted on the vendor's website may be used to satisfy this requirement.

c. The fuel sulfur contents shall be determined by the methods specified in 40 CFR 60.334 and 60.335. See Appendix F (NSPS Subpart GG, Stationary Gas Turbine Provisions) of this permit.

Also, see Appendix F of this permit for additional sulfur monitoring requirements of 40 CFR 60.334(h). [PSD-FL-214E and 40 CFR 60.334(h) and 60.335]

A.12. Fuel Nitrogen Monitoring. Monitoring of the nitrogen content for distillate oil shall be consistent with the requirements of 40 CFR 60.334(h). See Appendix F of this permit. There is no requirement to monitor the nitrogen content of natural gas because it contains negligible amounts of nitrogen. [PSD-FL-214E and 40 CFR 60.334(h)]

A.13. CAM Plan. The combined cycle units are also subject to the continuous assurance monitoring provisions in the CAM plan provided in Appendix CA of this permit. [Rule 62-213.440(1)(b)1.a, F.A.C. and 40 CFR 64]

TEST METHODS AND PROCEDURES

A.14. Test Methods. Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5B	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM_{10}.)
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)
CTM-027	Conditional EPA Test Method 027, Measurement of Ammonia Slip (or equivalent method)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [PSD-FL-214E, Rules 62-204.800 and 62-297.100, F.A.C., and 40 CFR 60, Appendix A]

A.15. NO_X Compliance Determination. A NO_X CEMS shall be used to demonstrate compliance with the NO_X BACT limitations of this permit. Therefore, if necessary, performance tests to determine compliance with NO_X NSPS limitation in 40 CFR 60.332 may be conducted at a single load between 90% and 100% of peak (or the highest physically achievable) load. [PSD-FL-214E and 40 CFR 60.335]

A.16. NO_X Correction to ISO Conditions. The permittee is not required to have the NO_X monitor continuously correct NO_X emissions concentrations to ISO conditions. However, the permittee shall keep records of the data needed to make the correction, and shall make the correction when required by the Department. Measured NO_X will be corrected to ISO conditions in accordance with 40 CFR 60.335. See Appendix F (Stationary Gas Turbine Provisions) of this permit. [PSD-FL-214E and 40 CFR 60.335]

A.17. Compliance Tests. During each federal fiscal year (October 1st to September 30th), each combustion turbine shall be tested to demonstrate compliance with the emissions standards for CO and opacity. Annual compliance tests for these pollutants shall be performed on each unit for each fuel fired for 400 hours or more during the federal fiscal year. In addition, compliance tests for ammonia slip emissions shall be conducted during the 12-month period prior to renewal of the operation permit. Unless specifically requested by the Compliance Authority pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas. Provided compliance is demonstrated with the CO emissions standards, compliance tests for VOC emissions are not required. [PSD-FL-214E and Rule 62-297.310(7), F.A.C.]

A.18. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7), F.A.C.]

A.19. Operating Rate During Testing. Pursuant to Rule 62-297.310(2), F.A.C., the operating rate may be restricted based on the rate at which the unit is tested. See Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(2), F.A.C.]

CONTINUOUS MONITORING REQUIREMENTS

A.20. NO_X CEMS. For each combustion turbine, a CEMS shall be installed, operated, and maintained to monitor NO_X emissions and a diluent gas (carbon dioxide or oxygen) in accordance with the applicable provisions in Subpart A of 40 CFR 60 (see Appendix E of this permit), the performance specifications of Appendix B in 40 CFR 60, the quality assurance procedures in Appendix F of 40 CFR 60. The applicable continuous emissions monitoring procedures of 40 CFR Part 75 may also be used to satisfy these monitoring requirements. [PSD-FL-214E]

RECORD KEEPING AND REPORTING REQUIREMENTS

A.21. Heat Input Curves. Manufacturer curves or equations of heat input and NO_X emission rate (lb/hour) corrections to other temperatures shall be provided to the Department and retained on site. Subject to the approval by the Department for technical validity while applying sound engineering principles, the manufacturer's curves shall be used to establish the heat input rates over a range of temperatures for the purposes of compliance determination. [PSD-FL-214E]

A.22. Excess NOx Notifications and Reports. The permittee submit the following written notifications and reports.

a. Notification. If NO_X emissions exceed six hours in any 24-hour period, the permittee shall notify the Compliance Authority within 24 hours by telephone, facsimile transmittal or electronic mail.

b. Quarterly NO_X Monitoring Report. Within 30 days following each calendar quarter, the permittee shall submit a report to the Compliance Authority that summarizes the following information for the quarter.

1. Identify the hours of NO_X emission data excluded from the compliance determination with the short-term limit due to each of the following: startups, shutdowns, documented malfunctions and fuel switches.

2. For each malfunction, identify the: date; approximate time range; duration (hours) of the malfunction; NO_X emission levels during the malfunction; problem and cause of the problem (if known); and corrective action taken (if any).

3. Identify the hours of NO_X monitoring system down time due to each of the following: monitor malfunctions; non-monitor malfunctions; quality assurance calibrations; other known causes; and unknown causes. Identify the monitor availability.

[Rules 62-4.070(3), 62-4.130, 62-4.160(14)(b), and Rule 62-210.700(6), F.A.C.]

A.23. Operational Records. The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or, any periods during which a continuous monitoring system or monitoring device is inoperative. The requirements include initiating a recordkeeping system to record the occurrence and duration of: any start up, shutdown, load change, fuel switch, high fuel-bound nitrogen content, and malfunction of a combustion turbine; malfunction of the air pollution control equipment; and the periods when the CEMS is inoperable. [PSD-FL-214E and 40 CFR 60.7(b)]

A.24. Reporting NOx Emissions in Excess of the NSPS Subpart GG Standard. A NO_X CEMS is required to demonstrate compliance with the BACT standards of this permit. For the purpose of reports required under 40 CFR 60.7(c), data from the NO_X CEMS shall be used to determine "excess emissions" for purposes of 40 CFR 60.7, 60.331 and 60.334. As required by EPA's March 12, 1993 determination, the NO_X monitor shall meet the applicable requirements of 40 CFR 60.13, Appendix B and Appendix F in 40 CFR 60 for certifying, maintaining, operating and assuring the quality of the system; shall be capable of calculating NOx emissions concentrations corrected to 15% oxygen; shall have no less than 95% monitor availability in any given calendar quarter; and shall provide a minimum of four data points for each hour and calculate an hourly average. The requirements for the CEMS specified by the specific conditions of this permit satisfy these requirements. [PSD-FL-214E and 40 CFR 60.334(c)(1)]

A.25. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

A.26. Heat Input Rate Records. To determine compliance with the natural gas and fuel oil firing heat input limitation, the permittee shall maintain daily records of natural gas and fuel oil consumption for each combustion turbine and provide the heating value for each fuel during the compliance test. All records shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Department upon request. [PSD-FL-214E]

A.27. Test Notifications and Reports. Test notifications and reports shall be submitted in accordance with the applicable requirements in Appendix D (Common Testing Requirements). [Rule 62-297.310, F.A.C.]

NSPS REQUIREMENTS

A.28. NSPS Provisions. Each combustion turbine is subject to the applicable requirements in 40 CFR 60, Subpart A (General Provisions) and Subpart GG (Stationary Gas Turbines). These provisions are included in Appendix E (NSPS Subpart A, General Provisions) and Appendix F (NSPS Subpart GG, Stationary Gas Turbine Provisions) of this permit. [Rule 62-204.800, F.A.C. and Subparts A and GG in 40 CFR 60]

This section addresses the following emissions units.

EU No.	Brief Description
-005 through -009	Five Twin Pac simple cycle sets (CT-4A – CT-8B) consisting of two combustion turbines (Pratt & Whitney Model No. FT-8), two exhaust stacks and common electrical generator. Each of the five Twin Pac systems is rated at 60 MW of direct power. The simple cycle units are used during periods of peak electrical demand. All units fire natural gas as the primary fuel and may fire low sulfur distillate oil as a backup fuel. To control CO and VOC emissions, all combustion turbines are equipped with catalytic oxidation systems. To control NO_X emissions, all units are equipped with water injection. The water-to-fuel ratio is continuously monitored and recorded for each unit. A NO_X and CO_2 CEMS ~~is~~ will be installed on ~~one of the~~ all ten combustion turbines in 2010.

{Permitting Note: The emissions units are regulated under: Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) of Air Quality and Best Available Control Technology (BACT); Subpart GG in 40 CFR 60, Standards of Performance for Stationary Gas Turbines; and Phase II of the federal Acid Rain program.}

ESSENTIAL POTENTIAL TO EMIT PARAMETERS

B.1. Permitted Capacity. The heat input to each combustion turbine set from firing natural gas shall not exceed 676.2 MMBtu per hour based on the following: 100% base load, a higher heating value (HHV) for natural gas and a compressor inlet air temperature of 55.4° F. The heat input to each combustion turbine set from firing No. 2 distillate oil shall not exceed 606.6 MMBtu per hour based on the following: 100% base load, a HHV for distillate oil and a compressor inlet air temperature of 85.1° F. Heat input rates will vary depending upon compressor conditions and the combustion turbine characteristics. The permittee shall maintain on site manufacturer's performance curves (or equations) that correct for site conditions and shall provide the Department with updates as necessary. Operating data may be adjusted for the appropriate site conditions in accordance with the performance curves on file with the Department. [PSD-FL-344B and Rule 62-210.200(PTE), F.A.C.]

B.2. Simple Cycle, Peaking Operation. Each combustion turbine shall operate only in simple cycle mode not to exceed the permitted hours of operation allowed by this permit. This restriction is based on the permittee's request, which formed the basis of the PSD applicability and resulted in the specified emission standards specified. For any request to convert a unit to combined cycle operation by installing/connecting heat recovery steam generators or changes to the fuel quality or quantity which may cause an increase in short or long term emissions, the permittee may be required to submit a full PSD permit application complete with a new proposal of the best available control technology as if the unit had never been built. [PSD-FL-344B and Rule 62-212.400(12), F.A.C.]

B.3. Allowable Fuels. Each combustion turbine shall only be fired with natural gas containing no more than 1 grain of sulfur per 100 dry standard cubic feet of gas (monthly average) and distillate oil containing no more than 0.05% sulfur by weight. [PSD-FL-344B and Rule 62-210.200(PTE), F.A.C.]

B.4. Hours of Operation. Each Twin Pac shall operate no more than 2000 hours during any rolling 12 calendar months on natural gas and 500 hours during any rolling 12 calendar months on distillate fuel oil, subject to the exceptions specified in Condition B.11of this subsection. The permittee shall install, calibrate, operate and maintain a monitoring system to measure and accumulate the hours of operation for each Twin Pac. In the event that any increase to the hours of operation (of any fuel type) is sought prior to December 31, 2010, a construction permit application shall be submitted for the installation of an SCR system (consistent with the conditions of this permit) prior to the increase being granted. If an increase from the 2000 hours on natural gas and 500 hours on distillate fuel oil is desired after December 31, 2010, the permittee shall be required to submit a full PSD permit application complete with a new proposal of the best available control technology as if the

unit had never been built. [PSD-FL-344B and Rules 62-212.400(PSD), 62-212.400(12) and 62-210.200(PTE), F.A.C.]

B.5. Operating Procedures. The determinations established by this permit rely on "good operating practices" to minimize emissions. Therefore, all operators and supervisors shall be properly trained to operate and maintain the combustion turbines and pollution control systems in accordance with the guidelines and procedures established by the manufacturer. The training shall include good operating practices as well as methods of minimizing excess emissions. [PSD-FL-344B and Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.]

EMISSIONS CONTROLS

B.6. Water Injection. To control NO_X emissions, the permittee shall install, calibrate, tune, operate, and maintain a water injection system for each combustion turbine. Each system shall be designed and operated to achieve the applicable NO_X emission limits. [PSD-FL-344B and Rule 62-212.400, F.A.C.]

B.7. Catalytic Oxidation System. To control CO and VOC emissions, the permittee shall install and maintain a catalytic oxidation system on each combustion turbine. [PSD-FL-344B and Rules 62-212.400(12) and 62-210.200(PTE), F.A.C.]

B.8. SCR System. The NO_X limits are specified in Condition B.11. Should an SCR system be installed, the NO_X emissions limits for each combustion turbine will be reduced to 5.0 ppmvd corrected to 15% oxygen when firing natural gas and 8.0 ppmvd corrected to 15% oxygen when firing distillate oil. The installation of SCR prior to December 31, 2010 shall void the limitation on operating hours when firing natural gas and allow full operation (8760 hours per year), of which 2400 hours per year may be while firing distillate oil. The ammonia slip rate shall be limited to 5 ppmvd corrected to 15% oxygen. [PSD-FL-344B and Rules 62-212.400(12) and 62-210(PTE), F.A.C.]

EMISSIONS STANDARDS

B.9. Summary. For informational and convenience purposes only, the following table summarizes the emissions standards as well as the equivalent potential hourly and annual emissions. Such standards are not separately enforceable. This table does not supersede any of the terms or conditions of this permit.

Pollutant	Twin Pac Emission Standards	Equivalent Emissions		Per Twin Pac lb/year [a]	5 Twin Pacs tons/year [a]
		Oil (lb/hr)	Gas (lb/hr)		
NO_X	Gas: "lb/hr" equivalent to 20 ppmvd Oil: 42 ppmvd @ 15% O_2	102.4	51	153,200	383
CO	Emissions Cap: 19.9 tons/year [b]	2.7	13.1	27,550	68.87
SO_2	Gas: 1 grain sulfur/100 scf of gas Oil: 0.05% sulfur by weight	29.4	1.8	18,300	45.75
PM_{10}	VE ≤ 10% opacity	14	6	19,000	47.5
VOC	Compliance with CO is a surrogate	9.2	16.6	37,800	94.5

a. Annual emission rates are based on 2000 hours of gas operation and 500 hours of oil operation.

b. Calculated maximum emissions based on oxidation catalyst at 90% removal efficiency and proposed limit.

[PSD-FL-344B]

B.10. CO Standard. As determined by EPA Method 10, CO emissions from each Twin Pac shall not exceed 19.9 tons per year. CO emissions from each combustion turbine shall not exceed 19 ppmvd from firing natural gas nor 7 ppm from firing distillate oil. In the event that any of these standards are exceeded, the permittee shall take appropriate steps (e.g., perform maintenance, replace catalyst, etc.) to reduce CO emissions below the

specified standards as demonstrated by conducting a subsequent retest within 60 days of obtaining the results of the exceedance. Compliance with the CO standard serves as a surrogate to limit VOC emissions. [PSD-FL-344B and Rule 62-212.400(12), F.A.C.]

~~**B.11.** NO_x Standards.~~

~~a. As determined by EPA Method 7E or 20, NO_x emissions from each combustion turbine shall not exceed 42 ppmvd while firing distillate oil. The compliance averaging time shall be the sampling period specified by the applicable compliance method.~~

~~b. NO_x emissions from each Twin Pac system shall not exceed a 64 lb/hr averaged over any calendar month while firing natural gas.~~

~~c. During the initial twelve calendar months of operation, NO_x emissions from each Twin Pac while firing natural gas shall not exceed a total of 102,000 pounds.~~

~~d. NO_x emissions from each Twin Pac system shall not exceed 102,000 pounds during any rolling 12 calendar month period while firing natural gas in accordance with the NO_x compliance spreadsheet in Appendix CS (equivalent to 20 ppm at full load for 2000 hours per year). If NO_x emissions from a Twin Pac system exceed 102,000 pounds during any rolling 12 calendar month period from firing natural gas, the corresponding limitation on hours of operation shall apply to that Twin Pac system for the next calendar month of actual operation. The limitation on hours of operation shall be calculated in accordance with the compliance spreadsheet in Appendix CS and will yield an equivalent and off setting NO_x reduction for the next calendar month of actual operation. The adjustment on the limitation on hours of operation will ensure a "truing up" of NO_x emissions on a monthly basis. During the next calendar month of actual operation, any hours operated in excess of the calculated limitation on hours of operation ("available hours") shall represent a violation of this permit.~~

~~e. If actual NO_x emissions from a Twin Pac system are less than 102,000 pounds during any rolling 12 calendar month period, it shall be permissible for that Twin Pac system to continue to operate on natural gas beyond the limitation specified in Condition B.4. (2000 hours on natural gas during any rolling 12 calendar months) provided that:~~

~~1. NO_x emissions from firing natural gas does not exceed 102,000 pounds during the rolling 12 calendar month period, and~~

~~2. The allowable hours of oil firing for the Twin Pac system specified in Condition B.4. (500 hours during any rolling 12 calendar months) shall be reduced by one hour for each hour of additional gas firing. In no case shall a Twin Pac operate more than 2500 total hours during any rolling 12 calendar month period.~~

~~f. The attached compliance spreadsheet in Appendix CS shall be used to calculate actual NO_x emissions.~~

~~g. The permittee shall demonstrate compliance with these standards by conducting performance tests, emissions monitoring and continuous water-to-fuel ratio monitoring in accordance with 40 CFR Part 60 Subpart GG, as well as all other conditions of this permit.~~

~~{Permitting Note: The NO_x emission limit established as BACT is equivalent to 20 ppmvd corrected to 15% oxygen based on 2000 hours per year of natural gas operation.} [PSD-FL-344B and Rule 62-212.400(PSD), F.A.C.]~~

B.11. NO_X Standards. As determined by NO_X CEMS:

h. NO_X emissions from each Twin Pac while firing gas shall be controlled to achieve an equivalent of 20 ppm at full load for 2,000 hours per year, which equates to 102,000 lbs over a rolling 12 calendar month period while firing natural gas as per the attached compliance spreadsheet, attachment and incorporated herein as a part of this permit as attachment CS. In the event that during any rolling 12 calendar month

period, the NO_X emissions while firing natural gas are in excess of 102,000 lbs, a corresponding "hours limitation" shall apply to that Twin Pac unit for the next calendar month of actual operation. The hours limitation shall be calculated in accordance with attachment CS and will yield an equivalent and off-setting NO_X reduction for the next calendar month of actual operation. This hours limitation adjustment will ensure a truing up of NO_X emissions on a monthly basis. During the next calendar month of actual operation, any hours operated in excess of the calculated hours limitation ("available hours") shall represent a violation of this permit.

i. NO_X emissions from each Twin Pac shall not exceed a 64 lb/hr average over any calendar month while firing natural gas.

j. During any 12 calendar month rolling average period, should the actual NO_X emissions for a Twin Pac unit total less than 102,000 lbs, it shall be permissible for that Twin Pac unit to fire an additional amount of natural gas (over the 2,000 hours limitation in Specific Condition **B.4.**) provided that:
(1) The 12-month rolling average of 102,000 lbs of NO_X for natural gas firing is not exceeded, and
(2) The allowable hours of oil firing (500 hours per Twin Pac per 12 month period) shall be reduced by one hour for each hour of additional gas firing. In no circumstance shall it be permissible for a Twin Pac to operate over 2,500 total hours during any 12 month period.

k. NO_X emissions from each combustion turbine shall not exceed 42 ppmvd while firing fuel oil. The compliance averaging time shall be the sampling period specified by the applicable compliance method.

l. During the initial twelve calendar months of operation, NO_X emissions while firing natural gas shall not exceed 102,000 lbs per Twin Pac, nor 64 lb/hr averaged over any calendar month.

m. Compliance with the standard specified herein shall satisfy the NSPS and BACT requirements.

n. The permittee shall demonstrate compliance with this standard by conducting performance tests, emissions monitoring and continuous water-to-fuel ratio monitoring in accordance with 40 CFR Part 60 Subpart GG, as well as all other conditions of this permit. Upon certification, tThe NO_X CEMS shall be used to demonstrate continuous compliance with the NO_X limits. Data shall be maintained to correlate the NO_X CEMS results to the water-to-fuel ratio monitoring results (see Condition B.23.). During periods of monitor downtime of the NO_X CEMS, the water-to-fuel ratio monitors shall serve as a surrogate for assuring compliance with the NO_X limits.

o. The attached Compliance Spreadsheet shall be used to calculate NO_X emissions, in accordance with Specific Condition **B.23.**

[PSD-FL-344B, 0490340-014-AC (PSD-FL-344C), and Rule 62-212.400(PSD), F.A.C.]

{Permitting Note: The NO_X emission limit established as BACT is equivalent to 20 ppmvd corrected to 15% oxygen based on 2000 hours per year of natural gas operation.}

B.12. PM/PM_{10} and SO_2 Standards. Emissions of particulate matter (PM/PM_{10}) and SO_2 shall be limited by the use of natural gas containing no more than 1 grain per 100 standard cubic feet and the use of distillate oil containing no more than 0.05% sulfur by weight. [PSD-FL-344B and Rule 62-212.400(PSD), F.A.C.]

B.13. Visible Emissions Standard. As determined by EPA Method 9, visible emissions from each combustion turbine shall not exceed 10% opacity based on a 6-minute average. [PSD-FL-344B and Rule 62-212.400(PSD), F.A.C.]

EXCESS EMISSIONS

B.14. Excess Emissions Prohibited. Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited. In the event that prohibited emissions occur, these emissions shall be included in the calculation of the 12-month rolling averages to demonstrate compliance with the continuous NO_X emissions standard. The permittee shall quantify the CO emissions resulting from a typical startup and include estimated annual startup emissions when demonstrating compliance with the annual emissions limitation specified in Condition B.10. [PSD-FL-344B and Rule 62-210.700(4), F.A.C.]

B.15. Excess Emissions Allowed. Providing the permittee adheres to best operational practices to minimize the amount and duration of excess emissions, the following conditions shall apply:

a. During startup and shutdown, visible emissions excluding water vapor shall not exceed 20% opacity for more than 2 hours in any 24-hour period.

b. During all startups, shutdowns, and malfunctions, the continuous emissions monitors (water-to-fuel ratio monitor ~~and~~ or NO_X CEMS) shall monitor and record emissions. However, up to 2 hours of monitoring data during any 24-hour period may be excluded from the continuous compliance demonstrations as a result of startups, shutdowns, and documented malfunctions. A documented malfunction means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile, or electronic mail. In case of malfunctions, the permittee shall notify the Compliance Authorities within one working day. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[~~PSD-FL-344B and~~ 40 CFR 60.334(j)(iii); Rules 62-4.130, 62-210.700(1) & (5) ~~and 62-4.130~~, F.A.C.; and, Permit Nos. PSD-FL-344B & 0490340-014-AC (PSD-FL-344C)]

EMISSIONS PERFORMANCE TESTING

B.16. Performance Test Methods. As required, compliance tests shall be performed in accordance with the following reference methods as described in 40 CFR 60, Appendix A, and adopted by reference in Chapter 62-204.800, F.A.C.

a. EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources;

b. EPA Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources;

c. EPA Method 7E, Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure);

d. EPA Method 18, Determination of Volatile Organic Concentrations, which may be used in conjunction with EPA Method 25 or 25A to account for the non-regulated methane portion of VOC emissions;

e. EPA Method 20, Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines;

f. EPA Method 25 or 25A, Determination of Volatile Organic Concentrations;

g. Conditional EPA Test Method 027, Measurement of Ammonia Slip, which shall be used in the event that SCR is installed; and

h. ASTM D6522-00, Standard Test Method for Determination of Nitrogen Oxides, Carbon Monoxide and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers and Process Heaters Using Portable Analyzers, as specified in 40 CFR 60.335.

No other test methods may be used for compliance testing unless prior written approval from the Department is received. [PSD-FL-344B and Rule 62-297.401, F.A.C.]

B.17. 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. 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. Provided compliance is demonstrated with the CO emissions standards, compliance tests for VOC emissions are not required.

b. 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. 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.

c. Testing for ammonia slip is required during the first scheduled annual performance tests after the cumulative hours of operation on each combustion turbine exceed 1500 hours of oil firing or 5000 hours of gas firing starting from the initial installation of the SCR catalysts. Thereafter, testing for ammonia slip is required during the first scheduled annual performance tests after subsequent cumulative 1500 hours of oil firing and 5000 hours of gas firing in each combustion turbine or after regeneration, replacement or addition to the SCR catalyst system.

d. 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.

~~e. For purposes of demonstrating ongoing qualification as Low Mass Emission (LME) Units under the federal Acid Rain program, the permittee shall comply with the procedures outlined in 40 CFR 75.19.~~

f. Following 3 years of annual testing for each combustion turbine, the permittee may request a reduction in the testing frequency (including retesting of NO_X-to-heat input correlation pursuant to Appendix E in 40 CFR 75 for each combustion turbine) as set forth below:

1. The permittee shall demonstrate to the Department's satisfaction that a group or groups of combustion turbines are performing identically;

2. No more than three of the ten combustion turbines may be considered as identical for the purposes of grouping, i.e. there shall be no less than 4 total groups;

3. The combustion turbine which is selected for testing within each group will be rotated annually;

4. The operating hour exemption from testing shall not apply to an entire group of combustion turbines, i.e. every group shall be required to demonstrate annual compliance during every federal fiscal year;

5. Should the combustion turbine selected for annual testing within a group fail to comply with any permitted emission standard or trigger an additional requirement within this permit, every combustion turbine within that group shall be considered to have done likewise and shall be treated as such; and

6. The Department reserves the right to discontinue the reduction in testing frequency for annual compliance demonstrations.

[PSD-FL-344B and Rules 62-4.070(3) and 62-297.310(7)(a), F.A.C.]

B.18. Tests Prior to Permit Renewal. Prior to renewing the air operation permit, the permittee shall conduct performance tests for CO, NO_X and visible emissions from each combustion turbine. Testing for ammonia slip meeting the requirements of Condition B.17 will satisfy the requirements of this condition. These tests shall be conducted within the 12-month period prior to renewing the air operation permit. For pollutants required to be tested annually, the permittee may submit the most recent annual compliance test to satisfy the requirements of

this provision. Compliance tests for VOC emissions are not required provided compliance is demonstrated with the CO emissions standards. [Rule 62-297.310(7)(a)3, F.A.C. and PSD-FL-344B]

B.19. Tests After Major Repairs or Replacements. The Department may require that additional compliance testing be conducted within 90 days after major repairs or replacements are performed. [PSD-FL-344B and Rule 62-297.310(7)(a)4, F.A.C.]

B.20. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7), F.A.C.]

B.21. Operating Rate During Testing. Pursuant to Rule 62-297.310(2), F.A.C., the operating rate may be restricted based on the rate at which the unit is tested. See Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(2), F.A.C.]

CONTINUOUS MONITORING REQUIREMENTS

B.22. ~~The combustion turbines qualify as Low Mass Emission (LME) Units for the purposes of Acid Rain. Accordingly, the permittee has indicated that these emissions units will follow the procedures outlined in 40 CFR 75.19 in lieu of NO_x CEMS. However, should the permittee elect or be otherwise required~~ The permittee has elected to install NO_X CEMS, for demonstrating continuous compliance with the NO_X limits. These ~~such~~ NO_X monitoring devices will be installed during the middle of 2010 and shall comply with the requirements of 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems. A monitoring plan shall be provided to the Department's Emissions Monitoring Section Administrator, EPA Region 4, and the Compliance Authority for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62. The plan shall consist of data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location. A monitor for carbon dioxide may be used in place of the oxygen monitor, but the system shall be capable of correcting the emissions to 15% oxygen. [PSD-FL-344B, 0490340-014-AC (PSD-FL-344C), Rule 62-212.400, F.A.C. and 40 CFR 75]

B.23. Water-to-Fuel Ratio Monitoring. Each Twin Pac shall be fitted with continuous water-to-fuel ratio monitoring equipment~~, as per 40 CFR 75 Appendix E. Appendix E is an alternative monitoring protocol that may be used by oil and gas-fired peaking units in lieu of installing a CEMS to measure NO_x emissions~~. The fuel flowmeters shall be maintained in accordance with 40 CFR 75 Appendix D. Hourly NO_X emissions (lbs for natural gas, ppm for oil) derived from the water-to-fuel monitors shall be correlated to the results of a series of stack tests conducted in accordance with Appendix E procedures during 2007, 2008 and 2009 based on the heat input to the unit at various water-to-fuel injection ratios. Hourly NOx emissions derived from the water-to-fuel monitors shall also be quality-assured via correlation to the results of the annual RATA and continuous CEMS data. Based upon the measured water-to-fuel ratio, and the measured heat input for each fuel, the actual NO_X emissions shall be calculated, and used for purposes of compliance during periods of NOx CEMS downtime. ~~With the appropriate load selection, the Subpart GG performance testing may also be utilized to satisfy the NO_x-to-heat input correlation testing requirements of Appendix E. Retesting of Appendix E NO_x-to-heat input correlation for each combustion turbine shall be required annually, except as provided for within Specific Condition **B.17.** of this permit. The permittee shall solicit a list from the turbine manufacturer of at least four operating parameters (indicative of NO_x formation) with acceptable ranges to serve as QA/QC parameters as per Appendix E. The manufacturer supplied ranges for the parameters, shall be used on an hourly basis to establish that the unit is being operated in a normal fashion and, therefore, that the NO_x-to-heat input correlation (by fuel type) can be used with validity. As a further means of ensuring the validity of the Appendix E protocol for determining NO_x emissions, one~~All of the five Twin Pacs shall be fitted with a NO_X CEMS. The NO_X CEMS ~~which is installed solely for this purpose (rather than one of the purposes outlined in Specific Condition 33 above)~~ shall ~~not~~ be the compliance method~~, but shall be utilized for the purpose of ensuring that the Appendix E protocol is being properly applied~~. The permittee shall maintain records of the annual ~~Annual~~ data (obtained

from the above required testing) ~~shall be provided to the Department~~ correlating the CEMS indication to the water-to-fuel ~~Appendix E~~ indication. During periods of NOx CEMS monitor downtime, the water-to-fuel ratio ~~monitors and the Appendix E procedures~~ shall be used to demonstrate compliance with the NO_X limits. [62-4.070, F.A.C., PSD-FL-344B and 0490340-014-AC (PSD-FL-344C)]

B.24. CEMS Installation, Quality Assurance and Operation. The CO_2 and NO_X CEMS shall be installed, quality assured and operated in accordance with the requirements of 40 CFR 60 Appendix B and F (or 40 CFR 75). [0490340-014-AC (PSD-FL-344C)]

COMPLIANCE DEMONSTRATIONS

B.25. Fuel Records. The permittee shall maintain records sufficient to demonstrate compliance with the fuel sulfur limits for natural gas (1 grain of sulfur per 100 scf of gas) and distillate oil (0.05% sulfur by weight) including those records required by 40 CFR 60.334 and 60.335. [PSD-FL-344B and Rules 62-4.070(3) and 62-4.160(15), F.A.C.]

B.26. Monthly Operations Summary. By the fifth calendar day of each month, the permittee shall record the hours of operation and amount of each fuel fired for each combustion turbine. An hour of operation is defined to include a totalization of every minute within a specified period (e.g., month), during which a permitted fuel is fired (regardless of the amount) divided by 60. The information shall be recorded in a written or electronic log and shall summarize the previous month of operation and the previous 12 months of operation. Information recorded and stored as an electronic file shall be available for inspection and/or printing within at least one day of a request from the Compliance Authority. [PSD-FL-344B and Rule 62-4.160(15), F.A.C.]

REPORTS

B.27. Excess Emissions Reporting and Semi-annual Reports. If excess NO_X or visible emissions occur due to malfunction, the permittee shall notify the Compliance Authority within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Following the NSPS format in 40 CFR 60.7(c), Subpart A, periods of startup, shutdown and malfunction, shall be monitored, recorded and reported as excess emissions when emission levels exceed the standards specified in this permit. Within 30 days following each calendar semi-annual period, the permittee shall submit a report on any periods of excess emissions that occurred during the previous semi-annual period to the Compliance Authority. [PSD-FL-344B, 40 CFR 60.7 and Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C.]

B.28. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. The Annual Operating Report shall include an estimate of all HAPS emitted, such that the Department can affirm that the facility complies with its synthetic minor status. [PSD-FL-344B and Rule 62-210.370(2), F.A.C.]

B.29. Test Notifications and Reports. Test notifications and reports shall be submitted in accordance with the applicable requirements in Appendix D (Common Testing Requirements). [Rule 62-297.310, F.A.C.]

NSPS REQUIREMENTS

B.30. NSPS Provisions. Each combustion turbine is subject to the applicable requirements in 40 CFR 60, Subpart A (General Provisions) and Subpart GG (Stationary Gas Turbines). These provisions are included in Appendix E (NSPS Subpart A, General Provisions) and Appendix F (NSPS Subpart GG, Stationary Gas Turbine Provisions) of this permit. [Rule 62-204.800, F.A.C. and Subparts A and GG in 40 CFR 60]

Operated by: Seminole Electric Cooperative, Inc.
Plant: Midulla Generating Station (formerly the Payne Creek Generating Station)
ORIS Code: 7380

Subsection A. Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

EU No.	Brief Description
001	Combined cycle Unit 1
002	Combined cycle Unit 2
005 - 009	Five Twin Pac simple cycle sets (CT-4A – CT-8B)

A.1. Acid Rain Part Applications. The Phase II permit applications submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application (DEP Form No. 62-210.900(1)(a)) dated May 29, 2007, which is attached at the end of this subsection. [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. SO_2 Allocations. SO_2 allowance allocations requirements for each Acid Rain unit are as follows:

EU No.	EPA ID No.	SO_2 allowances under Table 2 or 3 of 40 CFR Part 73*				
		2008	2009	2010	2011	2012
001	1A	0*	0*	0*	0*	0*
002	1B	0*	0*	0*	0*	0*

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4. Title IV and the Clean Air Act. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator. [40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]

Acid Rain Part- Page 1

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: ☐ New ☐ Revised ■ Renewal

STEP 1
Identify the source by plant name, State, and ORIS code

Plant Name	Payne Creek Generating Station	State	FL	ORIS Code	7380

STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a." For new units, enter the requested information in columns "c" and "d."

a	b	c	d
Unit ID#	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
1A	Yes		
1B	Yes		
4A	Yes	09/04/2006	03/03/2007
4B	Yes	09/04/2006	03/03/2007
5A	Yes	09/01/2006	02/28/2007
5B	Yes	09/01/2006	02/28/2007
6A	Yes	08/10/2006	02/06/2007
6B	Yes	08/10/2006	02/06/2007
7A	Yes	08/09/2006	02/05/2007
7B	Yes	08/09/2006	02/05/2007
8A	Yes	09/11/2006	03/10/2007
8B	Yes	09/11/2006	03/10/2007

Note: **Monitor certification deadline is the earlier of 90 unit operating days or 180 calendars after the date the unit commences commercial operation.**

Payne Creek Generating Station
Plant Name (from Step 1)

STEP 3
Read the standard requirements

Acid Rain Part Requirements

(1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
(ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part;
(2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department; and
(ii) Have an Acid Rain Part.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each Acid Rain unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
(i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.330, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Payne Creek Generating Station Plant Name (from Step 1)

STEP 3, Cont'd.

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_X averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State implementation Plans;
(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Read the certification statement, sign, and date

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name **Michael P. Opalinski**	
Signature	Date 5/29/07

Friday, Barbara

To:	'mopalinski@seminole-electric.com'
Cc:	'Juan Ramirez'; 'whentze@seminole-electric.com'; 'Tom Davis'; Halpin, Mike; Zhang-Torres; Oquendo.Ana@epamail.epa.gov; 'Forney.Kathleen@epamail.epa.gov'; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan; Walker, Elizabeth (AIR); Livingston, Sylvia
Subject:	SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV
Attachments:	DraftAC-DraftProposedAVSignedWrittenNoticeofIntent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Yousry Attalla

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-014-AC(PSD-FL-344C)/0490340-015-AV
Permit Status: DRAFT/PROPOSED
Permit Activity: PERMIT REVISION/MODIFICATION
Facility County: HARDEE

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0490340.014.AC.D_pdf.zip

Click on the following link to access the permit project documents:
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Permit project documents that 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.

Barbara Friday
Bureau of Air Regulation

Friday, Barbara

From: Microsoft Exchange
To: mopalinski@seminole-electric.com; Juan Ramirez; whentze@seminole-electric.com
Sent: Friday, April 16, 2010 2:36 PM
Subject: Relayed: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

mopalinski@seminole-electric.com

Juan Ramirez

whentze@seminole-electric.com

Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Mike Opalinski [MOpalinski@seminole-electric.com]
Sent: Wednesday, April 21, 2010 9:28 AM
To: Friday, Barbara
Subject: Re: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION;0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Documents were received and can be reviewed.

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 4/16/2010 2:36 PM >>>

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Barbara Friday

Friday, Barbara

From: Juan Ramirez [JRamirez@seminole-electric.com]
Sent: Friday, April 16, 2010 2:41 PM
To: Friday, Barbara
Subject: Re: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION;0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Received. Thanks!

Barbara...I noticed the address is incorrect for our site. It is 6697 not 6695.

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

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 4/16/2010 2:36 PM >>>

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Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

Friday, Barbara

From: Microsoft Exchange
To: Tom Davis
Sent: Friday, April 16, 2010 2:36 PM
Subject: Relayed: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Tom Davis

Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Friday, April 16, 2010 3:05 PM
To: Friday, Barbara
Subject: RE: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Barbara,

I have received and can access the documents referenced in your email below.

Thanks.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Friday, April 16, 2010 2:36 PM
To: mopalinski@seminole-electric.com
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan; Walker, Elizabeth (AIR); Livingston, Sylvia
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

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Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: MIDULLA GENERATING STATION
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Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
To: Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov
Sent: Friday, April 16, 2010 2:36 PM
Subject: Relayed: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Forney.Kathleen@epamail.epa.gov

Oquendo.Ana@epamail.epa.gov

Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Friday, Barbara

From: Microsoft Exchange
To: Zhang-Torres; Halpin, Mike; Livingston, Sylvia; Holtom, Jonathan; Gibson, Victoria
Sent: Friday, April 16, 2010 2:36 PM
Subject: Delivered: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message has been delivered to the following recipients:

Zhang-Torres

Halpin, Mike

Livingston, Sylvia

Holtom, Jonathan

Gibson, Victoria

Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Monday, April 19, 2010 8:41 AM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message was read on Monday, April 19, 2010 8:41:13 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Friday, April 16, 2010 2:37 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message was read on Friday, April 16, 2010 2:37:06 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Livingston, Sylvia
To: Friday, Barbara
Sent: Friday, April 16, 2010 2:50 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message was read on Friday, April 16, 2010 2:50:11 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Monday, April 19, 2010 11:31 AM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message was read on Monday, April 19, 2010 11:30:50 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Attalla, Yousry; Walker, Elizabeth (AIR)
Sent: Friday, April 16, 2010 2:36 PM
Subject: Delivered: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message has been delivered to the following recipients:

Attalla, Yousry

Walker, Elizabeth (AIR)

Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Attalla, Yousry
To: Friday, Barbara
Sent: Friday, April 16, 2010 3:03 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message was read on Friday, April 16, 2010 3:02:53 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Saturday, April 17, 2010 2:38 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/0490340-015-AV

Your message was read on Saturday, April 17, 2010 2:37:50 PM (GMT-05:00) Eastern Time (US & Canada).