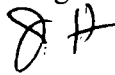


Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jon Holtom, Title V Section 
FROM: Yousry (Joe) Attalla
DATE: November 2, 2009
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 Modification

Attached for your review are the following items:

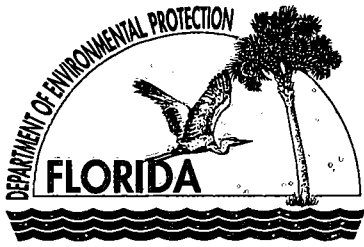
- Written Notice of Intent to Issue Air Permits;
- Public Notice of Intent to Issue Air Permits;
- P.E. Certification.
- Draft Air Construction Permit Modification;
- Statement of Basis;
- Draft/Proposed Title V Air Operation Permit Revision;

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 (CO₂) 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. 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

November 3, 2009

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 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 updates specific conditions of PSD-FL-344 to authorize the installation and operation of nitrogen oxide (NO_x) and carbon dioxide (CO₂) 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

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

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.

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

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.

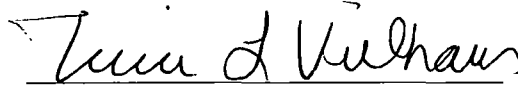
EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently 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

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

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 11/3/09 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-electric.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) 11/3/09 (Date)

**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 (CO₂) 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 CO₂ 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

(Public Notice to be Published in the Newspaper)

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

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

(Public Notice to be Published in the Newspaper)

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

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>.

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Permit Nos. 0490340-014-AC / PSD-FL-344C
and 0490340-015-AV
Facility ID No. 0490340
Midulla Generating Station
Installation of NO_x and CO₂ CEMS
Hardee County, Florida

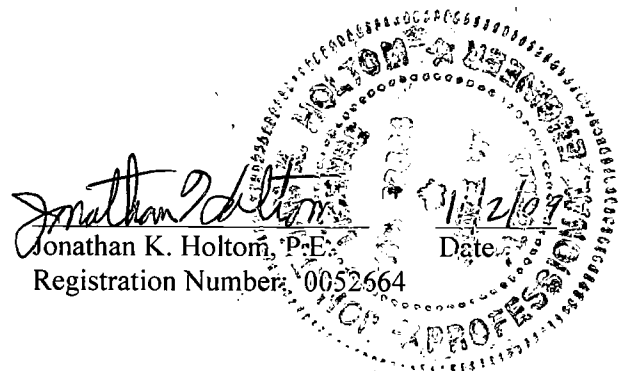
PROJECT DESCRIPTION

Seminole Electric Cooperative, Inc. request revisions of the Midulla Generating Station PSD and Title V permits with respect to the P&W Twin Pac simple cycle combustion turbine (Emission Units from 005 to 009) to allow for the installation of NO_x and CO₂ CEMS on each simple cycle combustion turbine. These CEMS will be used to monitor and report NO_x emissions as required by both the Acid Rain Program and 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.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not 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. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*

This review was conducted by Yousry Attalla (Joe) under my responsible supervision.



Jonathan K. Holtom, P.E.
Date: 01/21/09
Registration Number: 0052664

STATEMENT OF BASIS

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 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. A CAM plan is not required for the water injection systems because compliance is determined 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 renew the existing Title V permit for the above referenced facility.

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.

STATEMENT OF BASIS

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.

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 CO₂ 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), 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. All changes are emphasized with yellow highlight.

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 <u>and</u> CO ₂ CEMS is installed on one of the <u>all</u> ten combustion turbines.

B.11. NO_x Standards.

- 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.

STATEMENT OF BASIS

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.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 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. Hourly NO_x emissions (lbs for natural gas, ppm for oil) shall be correlated to the results of a series of stack tests based on the heat input to the unit at various water-to-fuel injection ratios. Based upon the measured water-to-fuel ratio, and the measured heat input for each fuel, the actual NO_x emissions shall be calculated. 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.~~ Annual data (obtained from the above required testing) shall be provided to the Department correlating the CEMS indication to the Appendix E indication. During periods of NO_x 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)]

STATEMENT OF BASIS

B.24. CEMS Installation, Quality Assurance and Operation. The CO₂ 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 Statutes (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

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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 6695 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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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 <u>and</u> CO ₂ CEMS is installed on one of the <u>all</u> ten combustion turbines.

{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.1 of 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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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 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.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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

B.12. PM/PM₁₀ and SO₂ Standards. Emissions of particulate matter (PM/PM₁₀) and SO₂ 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;

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

- 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 (\pm 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:

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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 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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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. Hourly NO_x emissions (lbs for natural gas, ppm for oil) shall be correlated to the results of a series of stack tests based on the heat input to the unit at various water-to-fuel injection ratios. Based upon the measured water-to-fuel ratio, and the measured heat input for each fuel, the actual NO_x emissions shall be calculated. 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.~~ Annual data (obtained from the above required testing) shall be provided to the Department correlating the CEMS indication to the Appendix E indication. During periods of NO_x 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 CO₂ 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,

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS.

Subsection B. Five Twin Pac Simple Cycle Combustion Turbine Sets

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]

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 CO₂ 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 (CO₂) 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. Midulla Generating Station is an existing electrical power plant (SIC No. 4911) located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. This plant was formerly known as the Payne Creek Generating Station. 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)

DRAFT PERMIT MODIFICATION

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-electric.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)

SECTION 1. GENERAL INFORMATION (DRAFT)

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 and Title V permits with respect to the Pratt & Whitney (P&W) Twin Pac SCCTs to allow for the installation of NO_x and CO₂ 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 CO₂ CEMS may also be used to monitor and report excess NO_x emissions pursuant to 40 CFR 60.334(j)(iii).

The pollutant analyzers planned for the Midulla Generating Station SCCTs are Thermo Scientific Model 42i (for NO_x) and Model 410i (for CO₂) instruments. Seminole Electric Cooperative, Inc. plans to install and certify the NO_x and CO₂ CEMS during the first quarter of 2010.

SECTION 2. PERMIT REVISIONS (DRAFT)

To recognize the change in the methods of monitoring emissions and to authorize the installation of the NO_x and CO₂ 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. All changes are emphasized with yellow highlight.

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 CO₂ CEMS for monitoring purpose and for continuous compliance with the NO_x emissions limits. [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(g) is changed as follows:
 17. Nitrogen Oxides (NO_x):
 - (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. 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~~ The permittee has elected to install NO_x CEMS, for demonstrating continuous compliance with the NO_x limits. These such NO_x monitoring devices shall comply with the requirements of 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems. A monitoring plan shall be

SECTION 2. PERMIT REVISIONS (DRAFT)

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. [Rule 62-212.400, F.A.C. and 40 CFR 75]

6. 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. Hourly NO_x emissions (lbs for natural gas, ppm for oil) shall be correlated to the results of a series of stack tests based on the heat input to the unit at various water-to-fuel injection ratios. Based upon the measured water-to-fuel ratio, and the measured heat input for each fuel, the actual NO_x emissions shall be calculated. 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.~~ Annual data (obtained from the above required testing) shall be provided to the Department correlating the CEMS indication to the Appendix E indication. During periods of NO_x 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]
7. CEMS Installation, Quality Assurance and Operation. The CO₂ 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.]
8. Notification of Installation. Within 30 days of completion of the installation, Quality Assurance and Certification of the of the NO_x and CO₂ 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.]

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

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).

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:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0490340.015.AV.D_pdf.zip

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- DRAFT AIR CONSTRUCTION PERMIT MODIFICATION
Permit Activity: PERMIT REVISION
Facility County: HARDEE

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

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
Division of Air Resource Management (DARM)

(850)921-9524

Friday, Barbara

From: Exchange Administrator
Sent: Tuesday, November 03, 2009 1:38 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT329483.txt; SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

This is an automatically generated Delivery Status Notification.

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

mopalinski@seminole-electric.com

JRamirez@seminole-electric.com

whentze@seminole-electric.com

Friday, Barbara

From: Mike Opalinski [MOpalinski@seminole-electric.com]
Sent: Tuesday, November 03, 2009 1:47 PM
To: Friday, Barbara
Cc: Mike Roddy
Subject: Re: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATINGSTATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

The referenced documents were received and reviewed.

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 11/3/2009 1:37 PM >>>

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).

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:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0490340.015.AV.D_pdf.zip

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- DRAFT AIR CONSTRUCTION PERMIT MODIFICATION
Permit Activity: PERMIT REVISION
Facility County: HARDEE

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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

Division of Air Resource Management (DARM)
(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

**** NOTICE ****

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential, proprietary and privileged information. Any un-authorized review, copying, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and delete all copies of the original message.

Friday, Barbara

From: Walt Hentze [WHentze@seminole-electric.com]
Sent: Tuesday, November 03, 2009 3:54 PM
To: Friday, Barbara
Subject: Re: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATINGSTATION;
0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

I can view the documents.

Walt Hentze

Director of Plant Operations -
Midulla Generating Station
Seminole Electric Cooperative, Inc.
Ph # 813-739-3102
Fax #813-739-3101
Cell #863-640-1120
Email whentze@seminole-electric.com

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 11/3/2009 1:37 PM >>>

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0490340.015.AV.D_pdf.zip

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- DRAFT AIR CONSTRUCTION PERMIT MODIFICATION
Permit Activity: PERMIT REVISION
Facility County: HARDEE

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

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Friday, Barbara

From: Exchange Administrator
Sent: Tuesday, November 03, 2009 1:38 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT329483.txt; SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

This is an automatically generated Delivery Status Notification.

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

tdavis@ectinc.com

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Tuesday, November 03, 2009 3:50 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: Tuesday, November 03, 2009 1:38 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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

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Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-014-AC(PSD-FL-344C)/0490340-015-AV
Permit Status: DRAFT/PROPOSED- DRAFT AIR CONSTRUCTION PERMIT MODIFICATION
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Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
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Friday, Barbara

From: System Administrator
To: Zhang-Torres; Gibson, Victoria; Attalla, Yousry
Sent: Tuesday, November 03, 2009 1:38 PM
Subject: Delivered:SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

Your message

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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Sent: 11/3/2009 1:38 PM

was delivered to the following recipient(s):

Zhang-Torres on 11/3/2009 1:38 PM
Gibson, Victoria on 11/3/2009 1:38 PM
Attalla, Yousry on 11/3/2009 1:38 PM

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Tuesday, November 03, 2009 1:38 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

Your message

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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Sent: 11/3/2009 1:38 PM

was read on 11/3/2009 1:38 PM.

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, November 03, 2009 2:38 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION;
0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

Your message

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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Sent: 11/3/2009 1:38 PM

was read on 11/3/2009 2:38 PM.

Friday, Barbara

From: Attalla, Yousry
To: Friday, Barbara
Sent: Tuesday, November 03, 2009 2:00 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION;
0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

Your message

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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Sent: 11/3/2009 1:38 PM

was read on 11/3/2009 2:00 PM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Tuesday, November 03, 2009 1:38 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

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

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4AF0786F_31047_111490_5 DBA281DC016

<Oquendo.Ana@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4AF0786F_31047_111490_5 DBA281DC016

Friday, Barbara

From: System Administrator
To: Halpin, Mike; Holtom, Jonathan
Sent: Tuesday, November 03, 2009 1:38 PM
Subject: Delivered:SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

Your message

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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Sent: 11/3/2009 1:38 PM

was delivered to the following recipient(s):

Halpin, Mike on 11/3/2009 1:38 PM
Holtom, Jonathan on 11/3/2009 1:38 PM

Friday, Barbara

From: Halpin, Mike
Sent: Tuesday, November 03, 2009 1:50 PM
To: Friday, Barbara
Subject: Delivered: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Attachments: ATT329587.txt

Your message was delivered to the recipient.

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Tuesday, November 03, 2009 2:43 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV

Your message

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
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-014-AC(PSD-FL-344C)/ 0490340-015-AV
Sent: 11/3/2009 1:38 PM

was read on 11/3/2009 2:43 PM.