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BUREAU OF AIR REGULATION

December 21, 2009

Mr. Yousry "Joe" Attalla
Department of Environmental Protection
2600 Blairstone Road, MS 5505
Tallahassee, Florida 32399-2400

RE: Seminole Electric Cooperative, Inc.
Midulla Generating Station, Air Construction Permit Modification and
Revised Title V Air Operation Permit
DEP Permit Nos.: 0490340-014-AC and 0490340-015-AV
OGC No. :09-3827

Dear Mr. Attalla:

Seminole Electric Cooperative ("Seminole") offers these comments in reference to the Florida Department of Environmental Protection's issuance of Draft Air Construction Permit Modification No. 0490340-014-AC (modifying the original Air Construction Permit No. 0490340-003-AC) and Draft/Proposed Revised Title V Air Operation Permit No. 0490340-015-AV (the third revised Title V Permit No. . The permits are being modified/revised to authorize Seminole to install NO_x and CO₂ CEMS on five Twin Pac simple cycle sets (emissions units 005-009) at its Midulla Generating Station to demonstrate continuous compliance with the permitted NO_x emission limits. Rather than offer comments to the Department's draft revision documents, Seminole suggests the following changes to underlying Permit Nos. 0490340-003-AC and 0490340-006-AV (as revised by the 009-AV and 011-AV revisions). Seminole believes these suggested changes are the only permit revisions needed. ~~Strikethrough~~ denotes Seminole's suggested deletion of text; underline denotes Seminole's suggested addition of text.

For Air Construction Permit No. 0490340-003-AC, Seminole offers the following comments.

1. It appears that the Department has an incorrect address for the Midulla Generating Station. The address should be 6697 N. County Road 663 in Bowling Green, Florida. Please correct all references to the address.

2. The following conditions should be added to this permit, because permittee has elected to install NO_x CEMS to demonstrate continuous compliance with the NO_x emission standards:

a. "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."

b. "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.]"

c. "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). [Rule 62-4.070, F.A.C.]"

d. "Notification of Installation. Within 30 days of completion of the installation, Quality Assurance and Certification 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.]"

3. Special Condition 17.(g) – This condition should be revised as follows to indicate that continuous compliance will be demonstrated by NO_x CEMS pursuant to 40 CFR Part 60 Subpart GG:

"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 emission standard."

4. Special Condition 17.(h) – This condition should be deleted, because continuous compliance will be demonstrated with a NO_x CEMS pursuant to 60.334(b):

"The attached Compliance Spreadsheet shall be used to calculate NO_x emissions, in accordance with Specific Condition 34."

5. Special Condition 20(b) – Specific Condition 20(b) should be revised as follows, because NO_x CEMS will be used to demonstrate continuous compliance:

"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 the 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)]"

6. Special Condition 25.(a) – Revise this condition as follows, because an annual performance test to demonstrate compliance with the NO_x emission standard is not necessary when continuous compliance is demonstrated by a NO_x CEMS:

"If conducted at permitted capacity, NO_x emissions data collected during the annual NO_x CEMS ~~continuous monitor~~ RATA required pursuant to 40 CFR 75 may be substituted for the required annual performance test."

7. Special Condition 25.(b) – The permittee has elected to install a NO_x CEMS and is no longer relying on the Twin Pac units' status as LME units; therefore, this condition should be deleted as follows:

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

8. Special Condition 26. – This condition should be revised as follows, because the permittee will demonstrate continuous compliance with a NO_x CEMS:

"Prior to renewing the air operation permit, the permittee shall conduct performance tests for CO, NO_x, VOC and visible emissions from each combustion turbine."

9. Special Condition 33. – This condition should be revised as follows, because the permittee has elected to install NO_x CEMS pursuant to 40 CFR 60.334(b):

~~"The combustion turbines qualify as Low Mass Emission (LME) Units for the purposes of Acid Rain. Accordingly, the permittee has indicated that these emissions units will follow the procedures outlined in 40 CFR 75.19 in lieu of~~

~~NO_x CEMS. However, should the permittee elect or be otherwise required to install NO_x CEMS, such NO_x monitoring devices shall comply with the requirements of 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems. Permittee has elected to install NO_x CEMS for each simple cycle combustion turbine. Each CEMS shall be installed, operated, and maintained to monitor NO_x emissions and a diluent gas (carbon dioxide) in accordance with applicable provisions in 40 CFR 60.334(b) for 40 CFR Part 75 monitoring systems.~~ A monitoring plans shall be provided to the Department's Emissions Monitoring Section Administrator, EPA Region 4, and the Compliance Authority for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62. The plan shall consist of data on CEM equipment specifications, manufacturer, type, calibration, and maintenance needs, and in its proposed location. A monitor for carbon dioxide may be used in place of the oxygen monitor, but the system shall be capable of correcting the emissions to 15% oxygen. [Rule 62-212.400, F.A.C., and 40 CFR 75]"

10. Special Condition 34. – This condition should be deleted in its entirety, because continuous compliance will be demonstrated with a NO_x CEMS pursuant to 60.334(b).

11. Appendix CS, Page CS-2 – This entire spreadsheet should be deleted as compliance will be demonstrated with a NO_x CEMS.

For Title V Air Operation Permit No. 0490340-006-AV (as revised by the 009-AV and 011-AV revisions), Seminole offers the following comments:

12. It appears that the Department has an incorrect address for the Midulla Generating Station. The address should be 6697 N. County Road 663 in Bowling Green, Florida. Please correct all references to the address.

13. Subsection A. Facility Description – The following sentences should be revised as follows, because permitted has elected to demonstrate continuous compliance with NO_x CEMS:

~~“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 is installed on one of the all ten combustion turbines. A CAM plan is not required for the water injection systems, because each unit monitors NO_x emissions with a CEMS. because compliance is determined by calculating NO_x emissions based on data from the continuous water to fuel monitoring system.”~~

14. Subsection B. Brief Description – Revise the following sentences as follows, because permitted has elected to demonstrate continuous compliance with NO_x CEMS:

~~“The water to fuel ratio is continuously monitored and recorded for each unit.”~~ A NO_x and CO₂ CEMS is installed on ~~one of the~~ all ten combustion turbines.”

15. Special Condition B.11.a. – Revise the following sentence as indicated below, because continuous compliance will be demonstrated with a NO_x CEMS:

“As determined by NO_x CEMS EPA Method 7E or 20, NO_x emissions from each combustion turbine shall not exceed 42 ppmvd while firing distillate oil.”

16. Special Condition B.11.g. – Revise the following sentence as indicated below, because continuous compliance will be demonstrated with a NO_x CEMS:

~~“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 emission standard in accordance with 40 CFR Subpart GG for 40 CFR Part 75 monitoring systems.”~~

17. Special Condition B.15.b. – This condition should be revised as follows:

“During all startups, shutdowns, and malfunctions, the ~~continuous emissions monitors (water to fuel ratio monitor and NO_x CEMS)~~ shall monitor and record emissions.”

18. Special Condition B.15. – Revise the rule citations at the end of this condition as follows:

“~~[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)]~~”

19. Special Condition B.17.d. – This condition should be revised as follows, because the permittee will demonstrate continuous compliance with a NO_x CEMS:

“If conducted at permitted capacity, NO_x emissions data collected during the annual NO_x CEMS ~~continuous monitor~~ RATA required pursuant to 40 CFR 75 may be substituted for the required annual performance test.”

20. Special Condition B.17.e. – This entire condition should be deleted, because the permittee has elected to install a NO_x CEMS.

21. Special Condition B.17.f. – This entire condition should be deleted, because the permittee will demonstrate continuous compliance with a NO_x CEMS.

22. Special Condition B.18. – This condition should be revised as follows, because the permittee will demonstrate continuous compliance with a NO_x CEMS:

“Prior to renewing the air operation permit, the permittee shall conduct performance tests for CO₂, NO_x and visible emissions from each combustion turbine.”

23. Special Condition B.22. – This condition should be revised as follows, because permittee has elected to install NO_x CEMS to demonstrate continuous compliance with the NO_x emission standards:

~~“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~~ The permittee has elected or be otherwise required to install NO_x CEMS, to demonstrate continuous compliance with the NO_x emission standards. 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]”

24. Special Condition B.23. – This condition should be deleted in its entirety, because Seminole will demonstrate continuous compliance with the NO_x emission standards with a NO_x CEMS.

25. Special Condition B.24. – The following condition should be added to Permit No. 0490340-015-AV, because permittee has elected to install NO_x CEMS to demonstrate continuous compliance with the NO_x emission standards:

“CEMS Installation, Quality Assurance and Operation. The CO₂ and NO_x CEMS shall be installed, quality assured and operated in accordance with the

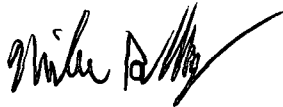
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requirements of 40 CFR 60 Appendix B and F (or 40 CFR 75). [0490340-014-AC (PSD-FL-344C)]"

Finally, Seminole noted in the July 31, 2009 letter to Trina Vielhauer accompanying its permit revision application that Seminole planned to install the NO_x/CO₂ CEMS during the first quarter of 2010. Seminole now plans to install the CEMS during the second quarter of 2010.

Thank you for your attention to this matter, and please feel free to contact me at (813) 739-1224 or Juan Ramirez at (813) 739-1219 at your convenience if you wish to discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Roddy", with a long horizontal flourish extending to the right.

Mike Roddy
Manager of Environmental Affairs

cc: Robert Manning, HGS
Paula L. Cobb, HGS