

Koerner, Jeff

From: Koerner, Jeff
Sent: Thursday, August 28, 2008 5:06 PM
To: 'Juan Ramirez'
Cc: Tom Davis (tdavis@ectinc.com)
Subject: RE: Preliminary Revised Permit Condition for the Peakers attheMidulla Station, Inlet CO Testing, For Discussion PurposesOnly

So, you're Ok with the revised condition for CO inlet testing?

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

From: Juan Ramirez [mailto:JRamirez@seminole-electric.com]
Sent: Thursday, August 28, 2008 9:23 AM
To: Koerner, Jeff
Subject: RE: Preliminary Revised Permit Condition for the Peakers attheMidulla Station, Inlet CO Testing, For Discussion PurposesOnly

Jeff,

We can do that.

Thanks,

Juan

>>> "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us> 8/27/2008 10:17 PM >>>

Since the "Twin Pacs" generally operate at the same time, how about one sample from each Twin Pac?

-----Original Message-----

From: Juan Ramirez [mailto:JRamirez@seminole-electric.com]
Sent: Wed 8/27/2008 9:54 AM
To: Koerner, Jeff; tdavis@ectinc.com
Cc:
Subject: Re: Preliminary Revised Permit Condition for the Peakers atthe Midulla Station, Inlet CO Testing, For Discussion PurposesOnly

Jeff,

Would this requirement be for all 10 peakers or could we test a unit or units with the most operating time?

Thanks,

1/13/2009

Juan

>>> "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us> 8/26/2008 3:37 PM
>>>

Project No. 0490340-012-AC

Juan and Tom,

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It only requires initial CO tests inlet/outlet, which have been done. After the initial tests, compliance tests are only required downstream of the catalyst.

I added the requirement to sample for catalyst reactivity at 24 month intervals, within a 4-month range.

Let me know what you think.

Thanks!

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

Revisions to Permit No. PSD-FL-344

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

Emissions Performance Testing

25. Annual Performance Tests:

a. To demonstrate compliance with the emission standards specified in this permit, the permittee shall conduct annual performance tests for NOX, CO, and visible emissions for each combustion turbine on each fuel. VOC emission tests are not required annually provided the CO emission standards are being met. The CO standard shall be demonstrated initially by the measurement of CO emissions upstream and downstream of the oxidation catalyst and by calculating CO removal efficiency; thereafter, compliance with the CO standard shall be demonstrated by conducting tests downstream of the oxidation catalyst. In the event that the measured removal efficiency is less than or equal to 85%, the Department shall be immediately notified and the oxidation catalyst shall be renewed within 120 calendar days of the test date. Failure to fully comply with this requirement shall represent a violation of this permit. Once the oxidation catalyst is renewed, the Department shall be notified as to the actual date complete. Within the first 24 months of operation, the permittee shall have a coupon of the

1/13/2009

catalyst 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. Testing for ammonia slip is required during the first scheduled annual performance tests after the cumulative hours of operation on each combustion turbine exceed 1,500 hours of oil firing or 5,000 hours of gas firing starting from the initial installation of the SCR catalysts. Thereafter, ammonia testing is required during the first scheduled annual performance tests after subsequent cumulative 1,500 hours of oil firing and 5,000 hours of gas firing in each combustion turbine or after regeneration, replacement or addition to the SCR catalyst system. If conducted at permitted capacity, NOX emissions data collected during the annual NOX continuous monitor RATA required pursuant to 40 CFR 75 may be substituted for the required annual performance test. Tests required on an annual basis shall be conducted at least once during each federal fiscal year (October 1st to September 30th). In the event that the operation of a combustion turbine is less than 400 hours per year on natural gas or distillate oil, annual testing is not required for that year and that fuel. [Rule 62-297.310(7)(a), F.A.C.]

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<<http://survey.dep.state.fl.us/?refemail=Jeff.Koerner@dep.state.fl.us>> .
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Koerner, Jeff

From: Koerner, Jeff
Sent: Wednesday, August 27, 2008 10:18 PM
To: Juan Ramirez; tdavis@ectinc.com
Subject: RE: Preliminary Revised Permit Condition for the Peakers atthe Midulla Station, Inlet CO Testing, For Discussion PurposesOnly

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Sent: Wed 8/27/2008 9:54 AM
To: Koerner, Jeff; tdavis@ectinc.com
Cc:
Subject: Re: Preliminary Revised Permit Condition for the Peakers atthe Midulla Station, Inlet CO Testing, For Discussion PurposesOnly

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Project No. 0490340-012-AC

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

Revisions to Permit No. PSD-FL-344

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Koerner, Jeff

From: Koerner, Jeff
Sent: Tuesday, August 26, 2008 3:38 PM
To: 'jramirez@seminole-electric.com'; Tom Davis (tdavis@ectinc.com)
Subject: Preliminary Revised Permit Condition for the Peakers at the Midulla Station, Inlet CO Testing, For Discussion Purposes Only

Project No. 0490340-012-AC

Juan and Tom,

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I added the requirement to sample for catalyst reactivity at 24 month intervals, within a 4-month range.

Let me know what you think.

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Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
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Koerner, Jeff

From: Juan Ramirez [JRamirez@seminole-electric.com]
Sent: Friday, August 29, 2008 9:50 AM
To: Koerner, Jeff
Subject: RE: Preliminary Revised Permit Condition for the PeakersattheMidulla Station, Inlet CO Testing, For DiscussionPurposesOnly

Yes sir.

>>> "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us> 8/28/2008 5:05 PM >>>

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Jeff Koerner, BAR - New Source Review Section
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Koerner, Jeff

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

Juan and Tom,

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

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

I will try to have the draft documents ready soon.

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

Thanks!

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

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

Koerner, Jeff

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

Elizabeth,

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

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

Thanks!

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
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