

Florida Department of
Environmental Protection

Memorandum

To: Joseph Kahn, Division of Air Resource Management
Through: Trina Vielhauer, Bureau of Air Regulation
From: Jeff Koerner, New Source Review Section
Date: March 3, 2009
Subject: Project No. 0490340-010-AC
Final Air Permit Revisions Nos. PSD-FL-214E and PSD-FL-344B
Seminole Electric Cooperative, Inc., Midulla Generating Station
Miscellaneous Air Construction Permit Revisions

The final permit revision for this project is attached for your approval and signature, which revises the following original PSD air construction permits for existing units at the Midulla Generating Station, which is located in Hardee County at 6695 County Road 663 in Bowling Green, Florida.

Revisions to Air Permit No. PSD-FL-214 (Two Combined Cycle Units)

The permit was revised to: remove of the requirement to conduct the annual compliance stack tests for VOC and SAM emissions; and replace the current SAM emission limits with a maximum fuel sulfur limit.

Revisions to Air Permit No. PSD-FL-344 (Five Twin Pac Simple Cycle Units)

The permit is revised to: remove the requirement to conduct compliance stack tests for VOC prior to the air operation permit renewal; increase the maximum heat input rate when firing natural gas from 635.6 MMBtu/hour (based on the higher heating value (HHV) and a compressor inlet temperature of 50° F) to 676.2 MMBtu/hour (based on the HHV and a compressor inlet temperature of 55.4° F); and increase the maximum heat input rate when firing distillate oil from 576.8 MMBtu/hour (based on the HHV and a compressor inlet temperature of 78° F) to 606.6 MMBtu/hour (based on the HHV and a compressor inlet temperature of 85.1° F).

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

TLV/jfk



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

NOTICE OF FINAL PERMIT REVISIONS

In the Matter of an
Application for Permit by:

Mr. Mike Roddy, Manager of Environmental Affairs
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, FL 33688-2000

Permit Nos. PSD-FL-214E and PSD-FL-344B
Project No. 0490340-010-AC
Midulla Generating Station
Facility ID No. 0490340
Miscellaneous Air Construction Permit Revisions

Enclosed is Final Permit Nos. PSD-FL-214E and PSD-FL-344B (Project No. 0490340-010-AC), which revises the original air construction permits for the two combined cycle units and five combustion turbine sets, respectively, at Seminole Electric Cooperative, Inc.'s Midulla Generating Station. This facility 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. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

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.

Joseph Kahn, Director
Division of Air Resource Management

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Project No. 0490340-010-AC
Final Air Permit Revisions Nos. PSD-FL-214E and PSD-FL-344B
Seminole Electric Cooperative, Inc., Midulla Generating Station
Miscellaneous Air Construction Permit Revisions

This project revises the following original PSD air construction permits for existing units at the Midulla Generating Station, which is located in Hardee County at 6695 County Road 663 in Bowling Green, Florida.

Revisions to Air Permit No. PSD-FL-214 (Two Combined Cycle Units)

The permit was revised to: remove of the requirement to conduct the annual compliance stack tests for VOC and SAM emissions; and replace the current SAM emission limits with a maximum fuel sulfur limit.

Revisions to Air Permit No. PSD-FL-344 (Five Twin Pac Simple Cycle Units)

The permit is revised to: remove the requirement to conduct compliance stack tests for VOC prior to the air operation permit renewal; increase the maximum heat input rate when firing natural gas from 635.6 MMBtu/hour (based on the higher heating value (HHV) and a compressor inlet temperature of 50^o F) to 676.2 MMBtu/hour (based on the HHV and a compressor inlet temperature of 55.4^o F); and increase the maximum heat input rate when firing distillate oil from 576.8 MMBtu/hour (based on the HHV and a compressor inlet temperature of 78^o F) to 606.6 MMBtu/hour (based on the HHV and a compressor inlet temperature of 85.1^o F).

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on January 26, 2009. The applicant published the Public Notice in The Herald-Advocate on January 29, 2009. The Department received the proof of publication on February 13, 2009. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Southwest District Office, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the final permit.

FINAL PERMIT REVISIONS

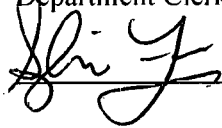
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit package (including the Final Determination and Final Permit) 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 3/4/09 to the persons listed below.

- Mr. Mike Roddy, SECI (wmroddy@seminole-electric.com)
- Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. (jramirez@seminole-electric.com)
- Mr. Walt Hentze, Seminole Electric Cooperative, Inc. (whentze@seminole-electric.com)
- Mr. Tom Davis, ECT, Inc. (tdavis@ectinc.com)
- Mr. Mike Halpin, Siting Office (halpin_m@dep.state.fl.us)
- Ms. Cindy Zhang-Torres, Southwest District Office (cindy.zhang-torres@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epamail.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 §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

3/4/09

(Date)

FINAL PERMIT REVISIONS

REVISIONS TO PERMIT PSD-FL-214

The original air construction permit had previously been modified by PSD-FL-214A, PSD-FL-214B, PSD-FL-214C and PSD-FL-214D. 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.

B. Emission Limits

1. Pursuant to Rule 62-212.410, F.A.C., BACT (now Rule 62-212.400, F.A.C.), the maximum allowable emission limitations from two CTs, when firing natural gas or No. 2 fuel oil, shall not exceed the following:

MAXIMUM ALLOWABLE EMISSION LIMITATIONS

<u>POLLUTANT</u>	<u>FUEL</u>	<u>CONCENTRATION</u>	<u>lbs/hr (a)</u>	<u>TPY (b)</u>	<u>TPY (TOTAL)</u>
NO _x	Gas	9 ppmvd(d)	68	596	906
	Oil	42 ppmvd(e)	336	504	
CO	Gas	20 ppmvd	71	622	618
	Oil	25 ppmvd	91	136	
PM/PM ₁₀	Gas	Compliance with the PM/PM ₁₀ mass emissions limits shall be demonstrated with initial tests only. Thereafter, compliance with the fuel sulfur specifications of this permit shall serve as a surrogate for compliance with the emissions limits.	7	65	147
	Oil		67	100	
SO ₂	Gas	SO ₂ emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SO ₂ mass emissions rates shown are estimated maximum emissions.	5	65	182
	Oil		101	100	
VOC	Gas	5 ppmvd	10	88	99
	Oil	10 ppmvd	21	31	
Sulfuric Acid Mist (SAM)	Gas	<u>SAM emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SAM mass emissions rates shown are estimated maximum emissions.</u> <u>[PSD-FL-214E]</u>	1	6	39
	Oil		22	34	
Visible Emissions	Gas		≤ 10 percent opacity		
	Oil		≤ 10 percent opacity		

{Permitting Note: The emissions limitations for beryllium and arsenic were removed in PSD-FL-214B.}

- (a) The emission limitations in lbs/hr/CT are a 1-hour average as determined pursuant to the Performance Testing conducted pursuant to Condition C.1 below.
- (b) The annual emission limitations (TPY) for natural gas are based on two CTs operating at full load for 8,760 hours per year. The annual emission limitations (TPY) for fuel oil are based on the equivalent of full-load operation for a maximum of 1500 hours per year for each of the two CTs (not to exceed 3,000 hrs/yr between the two CTs). The emission calculations are also based at a worst case ambient temperature of 32° F.
- (c) Maximum allowable emissions from two CTs if any fuel oil is burned at the facility during the year. The emission calculations are also based at an ambient temperature of 59° F.
- (d) The natural gas NO_x allowable emission limitation of 15 ppmvd is corrected to 15 percent O₂. Compliance shall be determined through the initial stack tests and by CEMS thereafter.
- (e) The fuel oil NO_x allowable emission limitation of 42 ppmvd is corrected to 15 percent oxygen. Compliance shall be determined through the initial stack tests and by CEMS thereafter.

C. Performance Testing

1. Initial (I) compliance tests shall be performed on each CT using each fuels. Annual (A) compliance tests shall be performed on each CT for each fuel used for more than 400 hours in the federal fiscal year. Tests shall also be conducted prior to permit renewal (R). Testing of emissions shall be conducted at 90% to 100% of the permitted maximum heat input rate for each fuel at average ambient conditions during the test. Tests shall be conducted using EPA reference in Chapter 62-297, F.A.C, and follows:

- a. Reference Method 5B for PM (I: for oil only, assumption is that all PM is PM₁₀). No subsequent testing is required unless requested by the Department pursuant to Rule 62-297.310(7)(b), F.A.C.
- b. Reference Method 9 for VE (I, A, R for oil only).
- c. Reference Method 10 for CO (I, A, R).
- d. Reference Method 20 or 7E for NO_x (I). Thereafter, compliance shall be demonstrated by NO_x CEMS.
- e. Reference Method 18 or 25A for VOC (I, A). Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required.
- f. Reference Method 8 for H₂SO₄ Mist (I, A).
- g. ASTM D4294 (or equivalent) for sulfur content of distillate oil (I and A), which can be used for determining SO₂ emissions annually.
- h. ASTM D1072-80, D3031-81, D4084-82, or D3246-81 (or equivalent) for sulfur content of natural gas (I and A, if deemed necessary by the Department).
- i. Other U.S. EPA or DEP approved test methods for the permitted facilities may be used for compliance testing after departmental approval. Unless the permittee requests to modify a reference method, or to use a method for which a method was not designed, such approval shall not constitute an alternative test procedure under Section 62-297.620, F.A.C., or otherwise require modification of the permit.

REVISIONS TO PERMIT NO. PSD-FL-344

The original air construction permit had previously been modified by PSD-FL-344A for revised CO testing. 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 ~~striketrough~~ 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

4. Permitted Capacity: The heat input to each combustion turbine set from firing natural gas shall not exceed ~~635.6~~ 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 ~~50~~ 55.4° F. The heat input to each combustion turbine set from firing No. 2 fuel oil shall not exceed ~~576.8~~ 606.6 MMBtu per hour based on the following: 100% base load, HHV and a compressor inlet air temperature of ~~78~~ 85.1° F. The permittee shall provide manufacturer’s performance curves (or equations) that correct for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing. Heat input rates will vary depending upon compressor conditions and the combustion turbine characteristics. Operating data may be adjusted for the appropriate site conditions in accordance with the performance curves on file with the Department. [Design, Rule 62-210.200, F.A.C. (Definition - PTE)]

25. Annual Performance Tests:

Note: The following condition incorporates the changes from previously issued Permit No. PSD-FL-344A for revised CO testing. Therefore, only the changes in current Project No. 0490340-010-AC (PSD-FL-344B) are shown in ~~striketrough~~ and double underline.

(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. Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required. ~~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. Within the first 24 months of operation, the permittee shall have one coupon of the catalyst from each Twin Pac (5 total) analyzed for catalytic reactivity. Subsequent samples shall be taken at 24-month intervals (± 2 months) and analyzed for catalytic reactivity. The purpose of the sampling program is to track the loss of catalyst reactivity. Based on data collected for the samples, the operator shall appropriately plan for the addition of catalyst or the replacement of catalyst as necessary to ensure compliance with the emissions standards of this permit. Within 60 days of determining the catalyst reactivity, the permittee shall submit a report to the Compliance Authority summarizing the results, the general trend of catalyst reactivity, all CO emissions tests and plans for adding or replacing catalyst. 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, 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. 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

FINAL PERMIT REVISIONS

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.]

There are no changes to paragraphs (b) and (c).

26. Tests Prior to Permit Renewal: 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. Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required. Testing for ammonia slip meeting the requirements of Condition 25 (above) "Annual Performance Tests" 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. [Rule 62-297.310(7)(a)3, F.A.C.]

Livingston, Sylvania

From: Livingston, Sylvania
Sent: Wednesday, March 04, 2009 3:43 PM
To: 'wmroddy@seminole-electric.com'
Cc: 'jramirez@seminole-electric.com'; 'whentze@seminole-eletric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Seminole Electric Cooperative, Inc - MIDULLA GENERATING STATION; 0490340-010-AC/ PSD-FL-214E and PSD-FL-344B
Attachments: 0490340-010-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final 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/0490340.010.AC.F_pdf.zip

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.

Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-010-AC/ PSD-FL-214E & PSD-FL-344B

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: HARDEE

Processor: Jeff Koerner

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/eproducts/apds/default.asp>.

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Mike Roddy [WMRoddy@seminole-electric.com]
Sent: Thursday, March 12, 2009 9:02 AM
To: Livingston, Sylvia
Subject: Re: FW: Seminole Electric Cooperative, Inc - MIDULLAGENERATING STATION;
0490340-010-AC/ PSD-FL-214E and PSD-FL-344B

I replied to you yesterday. I received it! Mike Roddy

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 3/12/2009 8:40 AM >>>

Mr. Roddy,

We have not received confirmation that you were able to access the documents attached to this March 4th e-mail, as well as the documents provided in the link (http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0490340.010.AC.F_pdf.zip) referenced in the email. Please confirm receipt by opening the attachment and clicking on the link to the permit documents, and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us

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.

From: Livingston, Sylvia
Sent: Wednesday, March 04, 2009 3:43 PM
To: 'wmrodde@seminole-electric.com'
Cc: 'jramirez@seminole-electric.com'; 'whentze@seminole-electric.com'; 'tdavis@ectinc.com'; Halpin, Mike; Zhang-Torres; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)

Subject: Seminole Electric Cooperative, Inc - MIDULLA GENERATING STATION; 0490340-010-AC/ PSD-FL-214E and PSD-FL-344B

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Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-010-AC/ PSD-FL-214E & PSD-FL-344B
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: HARDEE

Processor: Jeff Koerner

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Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us

Livingston, Sylvania

From: Juan Ramirez [JRamirez@seminole-electric.com]
Sent: Wednesday, March 04, 2009 6:10 PM
To: Livingston, Sylvania
Subject: Re: Seminole Electric Cooperative, Inc - MIDULLA GENERATINGSTATION; 0490340-010-AC/ PSD-FL-214E and PSD-FL-344B

Received.

Thanks!

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

**** NOTICE ****

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Livingston, Sylvia

From: Tom Davis [tdavis@ectinc.com]
Sent: Friday, March 06, 2009 7:12 AM
To: Livingston, Sylvia
Subject: RE: Seminole Electric Cooperative, Inc - MIDULLA GENERATING STATION; 0490340-010-AC/ PSD-FL-214E and PSD-FL-344B

Sylvia,

I have received and can view the documents provided.

Thanks.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, March 04, 2009 3:43 PM
To: wmroddy@seminole-electric.com
Cc: jamirez@seminole-electric.com; whentze@seminole-electric.com; tdavis@ectinc.com; Halpin, Mike; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth \ (AIR)\
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Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-010-AC/ PSD-FL-214E & PSD-FL-344B

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: HARDEE

Processor: Jeff Koerner

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Sylvia Livingston

Livingston, Sylvia

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Processor: Jeff Koerner

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Permit project documents 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 at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvania

From: Walt Hentze [WHentze@seminole-electric.com]
Sent: Thursday, March 05, 2009 10:29 AM
To: Livingston, Sylvania
Subject: Re: Seminole Electric Cooperative, Inc - MIDULLA GENERATINGSTATION; 0490340-010-AC/ PSD-FL-214E and PSD-FL-344B

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

>>> "Livingston, Sylvania" <Sylvia.Livingston@dep.state.fl.us> 3/4/2009 3:51 PM >>>

Dear Sir/ Madam:

Attached is the official **Notice of Final 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/0490340.010.AC.F_pdf.zip

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.

Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-010-AC/ PSD-FL-214E & PSD-FL-344B

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: HARDEE

Processor: Jeff Koerner

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Sylvia Livingston



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Bill Evers
Deputy Governor

Michael W. Soto
Secretary

September 10, 2008

Electronic Mail – Received Receipt Requested

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

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

Dear Mr. Opalinski:

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

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

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

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

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

REQUEST FOR ADDITIONAL INFORMATION

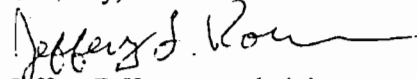
removed to accommodate the test team and apparatus. Since this part of the application request is complete, the Department agreed to consider this as a separate air construction permit revision. On August 29, 2008, the Department issued a draft permit (Project No. 0490340-012-AC) to revise only the CO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

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

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

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

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section

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

Mr. Michael Opalinski, Seminole Electric Cooperative, Inc. (mopalinski@seminole-electric.com)

Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. (jramirez@seminole-electric.com)

Mr. Walt Hentze, Seminole Electric Cooperative, Inc. (whentze@seminole-electric.com)

Mr. Tom Davis, ECT, Inc. (tdavis@ectinc.com)

Mr. Mike Halpin, Siting Office (halpin_m@dep.state.fl.us)

Ms. Cindy Zhang-Torres, Southwest District Office (cindy.zhang-torres@dep.state.fl.us)

Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Friday, Barbara

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

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Thank you,

DEP, Bureau of Air Regulation

9/10/2008

Friday, Barbara

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

Your message

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

was delivered to the following recipient(s):

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

Friday, Barbara

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

Your message

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

was delivered to the following recipient(s):

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

Friday, Barbara

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

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



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

This is an automatically generated Delivery Status Notification.

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

tdavis@ectinc.com

Friday, Barbara

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

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



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

This is an automatically generated Delivery Status Notification.

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

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

Friday, Barbara

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

Attachments: Delivery report; Message Headers



Delivery report.txt
(497 B)



Message
Headers.txt (2 KB)

This is the mail system at host mseive01.rtp.epa.gov.

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

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 48C7F0E0_6058_591_1 3D2E5443D5

Friday, Barbara

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

Attachments: ATT67686.txt



ATT67686.txt (153
B)

Your message was delivered to the recipient.

Friday, Barbara

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

Your message

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

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

Friday, Barbara

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

Received.

Thanks again,

Juan

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

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<<http://www.adobe.com/products/acrobat/readstep.html>> >
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Friday, Barbara

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

Your message

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

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

Friday, Barbara

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

Got it. Thanks.

Cindy

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

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

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

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

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Friday, Barbara

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

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

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--

Walker, Elizabeth (AIR)

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

Juan and Tom,

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

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

I will try to have the draft documents ready soon.

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

Thanks!

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

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

Walker, Elizabeth (AIR)

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

Elizabeth,

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

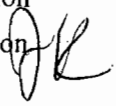
Also, they will be submitting a request for an exemption soon. Assign that to me as well.

Thanks!

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

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Jeff Koerner, New Source Review Section 
DATE: January 26, 2009
SUBJECT: Draft Permit No. 0490340-010-AC, Air Construction Permit Revision
Modifies Current Permit Nos. PSD-FL-214D and PSD-FL-344A
Concurrent Draft/Proposed Permit No. 0490340-011-AV, Title V Permit Revision
Modifies Current Permit No. 0490340-006-AV
Seminole Electric Cooperative, Inc.
Midulla Generating Station
Miscellaneous Revisions

Attached for your review is a combined draft permit package to concurrently revise existing Title V air operation Permit No. 0490340-006-AV to incorporate the proposed and final changes in the following air construction permits for the existing combustion turbines.

Concurrent Draft Air Construction Permit Revision No. 0490340-010-AC (PSD-FL-214E / PSD-FL-344B)

Original air construction Permit No. PSD-FL-214 for the existing two combined cycle combustion turbines (Units 1 and 2) will be revised to: replace the current sulfuric acid mist emission limits with a fuel sulfur limitation; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. Original air construction Permit No. PSD-FL-344 for the existing five sets of simple cycle combustion turbines (CT-4A to CT-8B) will be revised to: increase the maximum heat input rate when firing natural gas from 635.6 to 676.2 MMBtu/hour; increase the maximum heat input rate when firing distillate oil from 576.8 to 606.6 MMBtu/hour, and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. The changes in maximum heat input rates are to reflect the actual installed capabilities of the equipment as documented by the manufacturer, Pratt & Whitney.

Final Air Construction Permit No. 0490340-012-AC (PSD-FL-344A)

For the Twin Pac simple cycle combustion turbines, this final permit revision replaced the requirement to conduct the annual compliance stack tests for carbon monoxide upstream of the oxidation catalyst systems with a requirement to conduct periodic tests to determine the reactivity of the oxidation catalyst. Annual tests conducted after the oxidation catalysts are still required.

In addition, the Title V revision is being issued for parallel review by EPA Region 4. I recommend your approval of the attached draft/proposed permits for this project.

TLV/jfk

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Draft Air Permit No. PSD-FL-214E
Draft Air Permit No. PSD-FL-344B
Project No. 0490340-010-AC
Seminole Electric Cooperative, Inc.
Midulla Generating Station
Miscellaneous Revisions

PROJECT DESCRIPTION

Seminole Electric Cooperative, Inc. operates the Midulla Generating Station, which is an existing electrical generating plant (SIC No. 4911) located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. This station was formerly known as the Payne Creek Generating Station. The existing facility consists of two combined cycle combustion turbines (488 MW, total), ten simple cycle combustion turbines (300 MW, total) and miscellaneous ancillary support equipment. The combined cycle units are base loaded units and the simple cycle combustion turbines are used during peak periods of electrical power demand.

Revisions to Air Permit No. PSD-FL-214 (Two Combined Cycle Units)

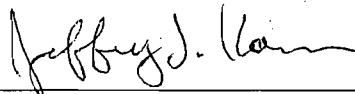
The permit was revised to: remove of the requirement to conduct the annual compliance stack tests for VOC and SAM emissions; and replace the current SAM emission limits with a maximum fuel sulfur limit.

Revisions to Air Permit No. PSD-FL-344 (Five Twin Pac Simple Cycle Units)

The permit is revised to: remove the requirement to conduct compliance stack tests for VOC prior to the air operation permit renewal; increase the maximum heat input rate when firing natural gas from 635.6 MMBtu/hour (based on the higher heating value (HHV) and a compressor inlet temperature of 50° F) to 676.2 MMBtu/hour (based on the HHV and a compressor inlet temperature of 55.4° F); and increase the maximum heat input rate when firing distillate oil from 576.8 MMBtu/hour (based on the HHV and a compressor inlet temperature of 78° F) to 606.6 MMBtu/hour (based on the HHV and a compressor inlet temperature of 85.1° F).

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, 62-210 and 62-212. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration No. 49441

1-26-09

(Date)



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

January 26, 2009

Mr. Mike Roddy, Manager of Environmental Affairs
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, FL 33688-2000

Re: Midulla Generating Station
Draft/Proposed Permit No. 0490340-011-AV, Title V Permit Revision
Draft Permit No. 0490340-010-AC, Revisions to PSD-FL-214 and PSD-FL-344

Dear Mr. Roddy:

Enclosed is a Draft/Proposed permit package to revise original air construction permits PSD-FL-214 and PSD-FL-344 and concurrently revise Title V air operation permit 0490340-006-AV to incorporate these changes as well as the revisions made in previously issued final permit 0490340-012-AC for the Midulla Generating Station. The existing power plant is located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. The permit package includes the following documents: the Written Notice of Intent to Issue Air Permits, the Public Notice of Intent to Issue Air Permits, the Draft Air Construction Permit Revision, the Technical Evaluation and Preliminary Determination, the Draft Title V Air Permit Revision and the Statement of Basis.

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. If you have any questions, please contact Jeff Koerner at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

*In the Matter of an
Application for Air Permits by:*

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

Responsible Official:
Mr. Mike Roddy, Manager of Environmental Affairs

Midulla Generating Station
Facility ID No. 0490340
Draft Permit No. 0490340-010-AC
Air Construction Permit Revisions
Draft/Proposed Permit No. 0490340-011-AV
Title V Air Permit Revision

Facility Location: Seminole Electric Cooperative, Inc. operates the Midulla Generating Station, which is an existing electrical generating plant 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: Project No. 0490340-010-AC (PSD-FL-214E and PSD-FL-344B) will revise original air construction permit PSD-FL-214 for the existing two combined cycle combustion turbines (Units 1 and 2) and revise original air construction permit PSD-FL-344 for the existing five sets of simple cycle combustion turbines (CT-4A to CT-8B). These projects were subject to preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD) of Air Quality. Original air construction Permit No. PSD-FL-214 (Units 1 and 2) will be revised to: replace the current sulfuric acid mist emission limits with a fuel sulfur limitation; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. Original air construction Permit No. PSD-FL-344 (CT-4A to CT-8B) will be revised to: increase the maximum heat input rate when firing natural gas from 635.6 to 676.2 MMBtu/hour; increase the maximum heat input rate when firing distillate oil from 576.8 to 606.6 MMBtu/hour; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. The changes in maximum heat input rates are to reflect the actual installed capabilities of the equipment as documented by the manufacturer, Pratt & Whitney.

Project No. 0490340-011-AV will revise existing Title V air operation Permit No. 0490340-006-AV to incorporate the changes proposed in Project No. 0490340-010-AC. In addition, Project No. 0490340-011-AV will incorporate the final changes made in previously issued final Permit No. 0490340-012-AC for the existing five Twin Pac simple cycle combustion turbines. That final project replaced the requirement to conduct annual compliance tests for carbon monoxide upstream of the oxidation catalyst systems with a requirement to conduct periodic tests to determine the reactivity of the oxidation catalyst.

Details of the projects are provided in the attached documents.

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 F.A.C. Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction permits and Title V air operation permits. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Florida Department of Environmental Protection's Division of Air Resource Management. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone 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 address indicated above for the Permitting Authority. The complete project file includes the Draft and Draft/Proposed permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted

Seminole Electric Cooperative, Inc.
Midulla Generating Station

Draft Permit No. 0490340-010-AC
Draft/Proposed Permit No. 0490340-011-AV

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. The Draft/Proposed permit documents can be viewed at the following web site:
<http://www.dep.state.fl.us/air/eproducts/apds>.

Notice of Intent to Issue Permits with Parallel Review by EPA: The Permitting Authority gives notice of its intent to issue a Draft air construction permit revision and a concurrent Draft/Proposed Title V air operation permit revision for the projects described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable 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 final permits in accordance with the conditions of the Draft/Proposed Permits 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 EPA has agreed to treat the Draft 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 (parallel review). 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>.

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 Permits (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 and the draft/proposed Title V air operation permit and requests for a public meeting for a period of 30 days from the date of publication of this Public Notice. Written comments and requests for a public meeting 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. 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. In addition, 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 comments result in a significant change to a draft/proposed permit, the Permitting Authority shall revise the draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. All comments filed for these projects 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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

#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 Permits. 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 Permits, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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.

Objections to the Draft Title V Air Operation Permit: 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>.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

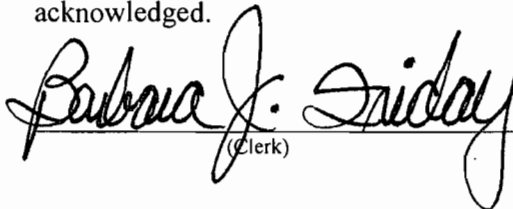
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permits package (including the Written Notice of Intent to Issue Air Permits, the Public Notice of Intent to Issue Air Permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination and the Draft/Proposed Permits) 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 1/26/09 to the persons listed below.

- Mr. Mike Roddy, SECI (wmroddy@seminole-electric.com)
- Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. (jramirez@seminole-electric.com)
- Mr. Walt Hentze, Seminole Electric Cooperative, Inc. (whentze@seminole-electric.com)
- Mr. Tom Davis, ECT, Inc. (tdavis@ectinc.com)
- Mr. Mike Halpin, Siting Office (Halpin_M@dep.state.fl.us)
- Ms. Cindy Zhang-Torres, Southwest District Office (Cindy.Zhang-Torres@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Vickie Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)
- Ms. Barbara Friday, BAR Title V Section (barbara.friday@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.

 1/26/09
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection

Notice of Intent to Issue Air Permits

Seminole Electric Cooperative, Inc., Midulla Generating Station

Draft/Proposed Permit No. 0490340-011-AV, Title V Air Permit Revisions

Draft Permit No. 0490340-010-AC, Air Construction Permit Revisions

Applicant: The applicant for this project is Seminole Electric Cooperative, Inc. The applicant's responsible official is Mr. Mike Roddy, the Manager of Environmental Affairs for Seminole Electric Cooperative, Inc. The applicant's mailing address is P.O. Box 272000, Tampa, Florida 33688-2000.

Facility Location: Seminole Electric Cooperative, Inc. operates the Midulla Generating Station, which is an existing electrical generating plant 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: Project No. 0490340-010-AC (PSD-FL-214E and PSD-FL-344B) will revise original air construction permit PSD-FL-214 for the existing two combined cycle combustion turbines (Units 1 and 2) and revise original air construction permit PSD-FL-344 for the existing five sets of simple cycle combustion turbines (CT-4A to CT-8B). These projects were subject to preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD) of Air Quality. Original air construction Permit No. PSD-FL-214 (Units 1 and 2) will be revised to: replace the current sulfuric acid mist emission limits with a fuel sulfur limitation; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. Original air construction Permit No. PSD-FL-344 (CT-4A to CT-8B) will be revised to: increase the maximum heat input rate when firing natural gas from 635.6 to 676.2 MMBtu/hour; increase the maximum heat input rate when firing distillate oil from 576.8 to 606.6 MMBtu/hour; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. The changes in maximum heat input rates are to reflect the actual installed capabilities of the equipment as documented by the manufacturer, Pratt & Whitney.

Project No. 0490340-011-AV will revise existing Title V air operation Permit No. 0490340-006-AV to incorporate the changes proposed in Project No. 0490340-010-AC. In addition, Project No. 0490340-011-AV will incorporate the final changes made in previously issued final Permit No. 0490340-012-AC for the existing five Twin Pac simple cycle combustion turbines. That final project replaced the requirement to conduct annual compliance tests for carbon monoxide upstream of the oxidation catalyst systems with a requirement to conduct periodic tests to determine the reactivity of the oxidation catalyst.

Details of the projects are provided in the attached documents.

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, F.A.C. Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction permits and Title V air operation permits. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Florida Department of Environmental Protection's Division of Air Resource Management. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone 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 address indicated above for the Permitting Authority. The complete project file includes the draft and draft/proposed permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

listed above. The draft/proposed permit documents can be viewed at:
<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Permits with Parallel Review by EPA: The Permitting Authority gives notice of its intent to issue a draft air construction permit revision and a concurrent draft/proposed Title V air operation permit revision for the projects described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable 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 final permits in accordance with the conditions of the draft/proposed Permits 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 EPA has agreed to treat the draft 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 (parallel review). 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>.

Comments: The Permitting Authority will accept written comments concerning the draft air construction permit and the draft/proposed Title V air operation permit and requests for a public meeting for a period of 30 days from the date of publication of this Public Notice. Written comments and requests for a public meeting 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. 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. In addition, 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 comments result in a significant change to a draft/proposed permit, the Permitting Authority shall revise the draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. All comments filed for these projects 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 decisions 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 (Telephone: 850/245-2241; Fax: 850/245-2303). 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 this Public Notice or within fourteen 14 days of receipt of written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

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; (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 Permits. 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.

Objections to the Draft Title V Air Operation Permit: 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>.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Project No. 0490340-010-AC
Draft Air Construction Permit Revisions PSD-FL-214E and PSD-FL-344B
Miscellaneous Air Construction Permit Revisions

COUNTY

Hardee

APPLICANT

Seminole Electric Cooperative, Inc.
Midulla Generating Station
ARMS Facility ID No. 0490340

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section



January 26, 2009

1. GENERAL PROJECT INFORMATION

Facility Description and Location

Seminole Electric Cooperative, Inc. operates the Midulla Generating Station, which is an existing electrical generating plant (SIC No. 4911) located in Hardee County at 6695 County Road 663 in Bowling Green, Florida. The UTM coordinates are Zone 17, 405 km East and 3057.7 km North. This station was formerly known as the Payne Creek Generating Station. The existing facility consists of two combined cycle combustion turbines (488 MW, total), ten simple cycle combustion turbines (300 MW, total) and miscellaneous ancillary support equipment. The combined cycle units are base loaded units and the simple cycle combustion turbines are used during peak periods of electrical power demand.

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. Emissions of particulate matter (PM), sulfur dioxide (SO₂) and sulfuric acid mist (SAM) are minimized by the firing of natural gas as the primary fuel and 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).

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 is installed on one of the ten combustion turbines.

Regulatory Categories

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

Project Description

On June 9, 2008, the Department received an application to revise original air construction permit PSD-FL-214 for the two combined cycle units and concurrently revise the existing Title V air operation permit, 0490340-006-AV. The applicant requests: removal of the requirement to conduct the annual compliance stack tests for VOC and SAM emissions; and replacement of the current SAM emission limits with a maximum fuel sulfur limit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

On June 30, 2008, the Department received a revision to this application. The applicant also requests a revision of original air construction permit PSD-FL-344 for the five simple cycle combustion turbine sets and a concurrent revision of the existing Title V air operation permit, 0490340-006-AV. The new request is to: remove the requirement to conduct the annual compliance stack tests for CO upstream of the oxidation catalyst system; and to remove the requirement to conduct compliance stack tests for VOC prior to the air operation permit renewal.

On August 13, 2008, the Department received a revision to this application. The applicant also requests a revision of original air construction permit PSD-FL-344 for the five simple cycle combustion turbine sets and a concurrent revision of the existing Title V air operation permit, 0490340-006-AV. The new request is to: increase the maximum heat input rate when firing natural gas from 635.6 million British Thermal Units per hour (MMBtu/hour, based on the higher heating value (HHV) and a compressor inlet temperature of 50° F) to 676.2 MMBtu/hour (based on the HHV and a compressor inlet temperature of 55.4° F); and increase the maximum heat input rate when firing distillate oil from 576.8 MMBtu/hour (based on the HHV and a compressor inlet temperature of 78° F) to 606.6 MMBtu/hour (based on the HHV and a compressor inlet temperature of 85.1° F).

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review, and Non-attainment Area Review
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

Federal Regulations

This project is also subject to the applicable federal provisions regarding air quality as established by the Environmental Protection Agency (EPA) in the following sections of the Code of Federal Regulations (CFR).

<u>Title 40, CFR</u>	<u>Description</u>
Part 60	Subpart A - General Provisions for NSPS Sources NSPS Subpart GG – Stationary Gas Turbines

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's approved PSD program specified in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories defined for major stationary sources, or

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- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates as defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered “significant” and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be “major” with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

The project is located in Hardee County, which is in an area that is currently in attainment with the state and federal AAQS or otherwise designated as unclassifiable. The facility is an existing PSD-major stationary source and the project is subject to a PSD applicability review. However, there are no expected actual emissions increases and only minor changes to the existing permit conditions are requested. Therefore, the project is not subject to PSD preconstruction review.

3. DEPARTMENT'S PROJECT REVIEW

Revisions to Permit PSD-FL-214, Combined Cycle Turbine Units 1 and 2

On September 28, 1995, the Department issued air construction Permit PSD-FL-214 which authorized Seminole Electric, Inc. to construct combined cycle combustion turbine Units 1 and 2. The original permit has been revised four times since initial issuance. For the current project, the applicant requests the following changes.

1. *Applicant Request:* Replace the current SAM emissions limits (1 lb/hour for gas firing and 22 lb/hour for oil firing) in Condition B.1 with a maximum fuel sulfur limit of pipeline natural gas and 0.05% by weight for distillate oil. As justification, the applicant cites consistency with “Department policy” regarding SAM emissions testing for combustion turbines.

Department Response: The Department reviews each PSD application on a case-by-case basis and establishes BACT in accordance with the regulatory requirements. It does not have a “Department policy” regarding SAM emission testing for combustion turbines. However, SAM emissions are generated based on the sulfur content of the fuel fired since there are no control devices or techniques available for reducing these emissions from the combustion turbines. Previous tests conducted for SAM emissions (2001 to 2007) demonstrate compliance with the standards. Therefore, the Department agrees to establish the following authorized fuels as the surrogate standards for SAM emissions: natural gas; and distillate oil with a maximum fuel sulfur content of 0.05% by weight. To accommodate this change, the following text will be added to the table in Condition B.1 under “Concentration” for SAM emissions.

“SAM emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SAM mass emissions rates shown are estimated maximum emissions. [PSD-FL-214E]”

No other changes were necessary because the authorized fuels are already established in Condition A.3.

2. *Applicant Request:* Remove the requirement in Condition C.1.f to conduct annual compliance tests for SAM emissions.

Department Response: Since the SAM emissions limit will be removed, the requirement to conduct annual testing will also be removed. Because this revises a BACT standard, the public comment period for this modification project will be 30 days.

3. *Applicant Request:* Replace the requirement in Condition C.1.e to conduct annual VOC compliance tests for each fuel fired for more than 400 hours per federal fiscal year with a requirement that VOC compliance tests are not required if a unit is in compliance with the CO emissions limit. As justification, the applicant cites consistency with “Department policy” regarding VOC emissions testing for combustion turbines.

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Department Response: See above regarding "Department policy". For combustion turbines, low CO emissions generally mean low VOC emissions. Previous tests conducted for VOC emissions (2001 to 2007) demonstrate compliance with the standards. Therefore, the condition will be revised to include the following provision, "Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required."

Revisions to Permit PSD-FL-344, Ten Simple Cycle Combustion Turbines CT-4A through CT-8B

On June 29, 2005, the Department issued air construction permit PSD-FL-344, which authorized Seminole Electric Cooperative, Inc. to construct five combustion turbine sets (Twin Pacs) consisting of two combustion turbines per set. The applicant requests the following changes to this permit.

1. *Applicant Request:* Currently, Condition 25a requires annual CO tests for each fuel type to be conducted both upstream and downstream of the oxidation catalyst. The results of the CO tests are then used to calculate the CO destruction efficiency of the oxidation catalyst. The applicant requests removal of the requirement to conduct the annual tests for CO upstream of the oxidation catalyst. The applicant states that the annual CO tests are unnecessary since compliance is demonstrated by the results of the CO emissions tests conducted on the combustion turbine exhaust. In addition, testing CO emissions upstream of the oxidation catalyst is problematic due to space constraints.

Department Response: In September of 2008, the Department issued final Project No. 0490340-012-AC (PSD-FL-344A) as a separate permitting action, which modified original Permit No. PSD-FL-344 to revise the CO test requirements. No further revision to the air construction permit is necessary.

2. *Applicant Request:* Currently, Condition 26 requires VOC compliance tests prior to air operation permit renewal. Similar to the VOC testing requirements for Units 1 and 2, the applicant requests replacing this provision with a requirement that VOC compliance tests are not required if a unit is in compliance with the CO emissions limit.

Department Response: Again, for combustion turbines, low CO emissions generally mean low VOC emissions. Previous tests conducted for VOC emissions (2006 to 2008) demonstrate compliance with the standards. Therefore, the condition will be revised to include the following provision, "Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required."

3. *Applicant Request:* The applicant requests a revision to: increase the maximum heat input rate when firing natural gas from 635.6 MMBtu/hour (HHV and a compressor inlet temperature of 50 deg. F) to 676.2 MMBtu/hour (HHV and a compressor inlet temperature of 55.4 deg. F); and increase the maximum heat input rate when firing distillate oil from 576.8 MMBtu/hour (HHV and a compressor inlet temperature of 78 deg. F) to 606.6 MMBtu/hour (HHV and a compressor inlet temperature of 85.1 deg. F). The maximum heat input rates are for base load operation at 80% relative humidity and an ambient air pressure of 14 psia. The requested rates reflect the maximum heat input rates provided by the gas turbine manufacturer, Pratt & Whitney. The units will continue to comply with all current emissions standards and operating limitations in all valid permits.

Department Response: The applicant provided data from the manufacturer, Pratt & Whitney, to verify the higher heat input rates. In September of 2008, the Department issued an exemption from the requirement to obtain an air construction permit to authorize temporary operation at the higher heat input rates to gather operational and emissions data. Data collected during previous tests as well as the 2008 tests indicate that the Twin Pac units are capable of complying with the existing emissions standards while operating at the requested higher heat input rates. Unit 5B was removed from service and returned to Pratt & Whitney for repair. Tests conducted on Unit 5B after being reinstalled, also confirm compliance with the emissions standards at the increased heat input rates.

The Department considers this action a minor revision to identify the actual installed maximum heat input

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rates because these units recently began operation in 2006, require no additional modifications to realize the increased heat input rates, and will not result in any emissions increases. The permit will be revised accordingly.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

NOTICE OF FINAL PERMIT REVISION

In the Matter of an
Application for Permit by:

Mr. Mike Roddy, Manager of Environmental Affairs
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, FL 33688-2000

Permit Nos. PSD-FL-214E and PSD-FL-344B
Project No. 0490340-010-AC
Midulla Generating Station
Facility ID No. 0490340
Miscellaneous Air Construction Permit Revisions

Enclosed is Final Permit Nos. PSD-FL-214E and PSD-FL-344B (Project No. 0490340-010-AC), which revises the original air construction permits for the two combined cycle units and five combustion turbine sets, respectively, at Seminole Electric Cooperative, Inc.'s Midulla Generating Station. This facility 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. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit package (including the Final Determination and Final Permit) 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 1/26/09 to the persons listed below.

- Mr. Mike Roddy, SECI (wmroddy@seminole-electric.com)
- Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. (jramirez@seminole-electric.com)
- Mr. Walt Hentze, Seminole Electric Cooperative, Inc. (whentze@seminole-electric.com)
- Mr. Tom Davis, ECT, Inc. (tdavis@ectinc.com)
- Mr. Mike Halpin, Siting Office (Halpin_M@dep.state.fl.us)
- Ms. Cindy Zhang-Torres, Southwest District Office (Cindy.Zhang-Torres@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Vickie Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILED AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Paula J. Friday (Clerk) 1/26/09 (Date)

REVISIONS TO PERMIT PSD-FL-214

The original air construction permit had previously been modified by PSD-FL-214A, PSD-FL-214B, PSD-FL-214C and PSD-FL-214D. 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.

B. Emission Limits

1. Pursuant to Rule 62-212.410, F.A.C., BACT (now Rule 62-212.400, F.A.C.), the maximum allowable emission limitations from two CTs, when firing natural gas or No. 2 fuel oil, shall not exceed the following:

MAXIMUM ALLOWABLE EMISSION LIMITATIONS

<u>POLLUTANT</u>	<u>FUEL</u>	<u>CONCENTRATION</u>	<u>lbs/hr (a)</u>	<u>TPY (b)</u>	<u>TPY (TOTAL)</u>
NO _x	Gas	9 ppmvd(d)	68	596	906
	Oil	42 ppmvd(e)	336	504	
CO	Gas	20 ppmvd	71	622	618
	Oil	25 ppmvd	91	136	
PM/PM ₁₀	Gas	Compliance with the PM/PM ₁₀ mass emissions limits shall be demonstrated with initial tests only. Thereafter, compliance with the fuel sulfur specifications of this permit shall serve as a surrogate for compliance with the emissions limits.	7	65	147
	Oil		67	100	
SO ₂	Gas	SO ₂ emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SO ₂ mass emissions rates shown are estimated maximum emissions.	5	65	182
	Oil		101	100	
VOC	Gas	5 ppmvd	10	88	99
	Oil	10 ppmvd	21	31	
Sulfuric Acid Mist (SAM)	Gas	<u>SAM emissions shall be controlled by complying with the fuel sulfur specifications of this permit. The SAM mass emissions rates shown are estimated maximum emissions.</u> <u>[PSD-FL-214E]</u>	1	6	39
	Oil		22	34	
Visible Emissions	Gas		≤ 10 percent opacity		
	Oil		≤ 10 percent opacity		

{Permitting Note: The emissions limitations for beryllium and arsenic were removed in PSD-FL-214B.}

- (a) The emission limitations in lbs/hr/CT are a 1-hour average as determined pursuant to the Performance Testing conducted pursuant to Condition C.1 below.
- (b) The annual emission limitations (TPY) for natural gas are based on two CTs operating at full load for 8,760 hours per year. The annual emission limitations (TPY) for fuel oil are based on the equivalent of full-load operation for a maximum of 1500 hours per year for each of the two CTs (not to exceed 3,000 hrs/yr between the two CTs). The emission calculations are also based at a worst case ambient temperature of 32° F.
- (c) Maximum allowable emissions from two CTs if any fuel oil is burned at the facility during the year. The emission calculations are also based at an ambient temperature of 59° F.
- (d) The natural gas NO_x allowable emission limitation of 15 ppmvd is corrected to 15 percent O₂. Compliance shall be determined through the initial stack tests and by CEMS thereafter.
- (e) The fuel oil NO_x allowable emission limitation of 42 ppmvd is corrected to 15 percent oxygen. Compliance shall be determined through the initial stack tests and by CEMS thereafter.

C. Performance Testing

1. Initial (I) compliance tests shall be performed on each CT using each fuel. Annual (A) compliance tests shall be performed on each CT for each fuel used for more than 400 hours in the federal fiscal year. Tests shall also be conducted prior to permit renewal (R). Testing of emissions shall be conducted at 90% to 100% of the permitted maximum heat input rate for each fuel at average ambient conditions during the test. Tests shall be conducted using EPA reference in Chapter 62-297, F.A.C, and follows:

- a. Reference Method 5B for PM (I: for oil only, assumption is that all PM is PM₁₀). No subsequent testing is required unless requested by the Department pursuant to Rule 62-297.310(7)(b), F.A.C.
- b. Reference Method 9 for VE (I, A, R for oil only).
- c. Reference Method 10 for CO (I, A, R).
- d. Reference Method 20 or 7E for NO_x (I). Thereafter, compliance shall be demonstrated by NO_x CEMS.
- e. Reference Method 18 or 25A for VOC (I, A). Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required.
- f. Reference Method 8 for H₂SO₄ Mist (I, A).
- g. ASTM D4294 (or equivalent) for sulfur content of distillate oil (I and A), which can be used for determining SO₂ emissions annually.
- h. ASTM D1072-80, D3031-81, D4084-82, or D3246-81 (or equivalent) for sulfur content of natural gas (I and A, if deemed necessary by the Department).
- i. Other U.S. EPA or DEP approved test methods for the permitted facilities may be used for compliance testing after departmental approval. Unless the permittee requests to modify a reference method, or to use a method for which a method was not designed, such approval shall not constitute an alternative test procedure under Section 62-297.620, F.A.C., or otherwise require modification of the permit.

REVISIONS TO PERMIT NO. PSD-FL-344

The original air construction permit had previously been modified by PSD-FL-344A for revised CO testing. 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

4. Permitted Capacity: The heat input to each combustion turbine set from firing natural gas shall not exceed 635.6 ~~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 50 ~~55.4~~° F. The heat input to each combustion turbine set from firing No. 2 fuel oil shall not exceed 576.8 ~~606.6~~ MMBtu per hour based on the following: 100% base load, HHV and a compressor inlet air temperature of 78 ~~85.1~~° F. The permittee shall provide manufacturer's performance curves (or equations) that correct for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing. Heat input rates will vary depending upon compressor conditions and the combustion turbine characteristics. Operating data may be adjusted for the appropriate site conditions in accordance with the performance curves on file with the Department. [Design, Rule 62-210.200, F.A.C. (Definition - PTE)]

25. Annual Performance Tests:

Note: The following condition incorporates the changes from previously issued Permit No. PSD-FL-344A for revised CO testing. Therefore, only the changes in current Project No. 0490340-010-AC (PSD-FL-344B) are shown in ~~strikethrough~~ and double underline.

(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. Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required. ~~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. Within the first 24 months of operation, the permittee shall have one coupon of the catalyst from each Twin Pac (5 total) analyzed for catalytic reactivity. Subsequent samples shall be taken at 24-month intervals (± 2 months) and analyzed for catalytic reactivity. The purpose of the sampling program is to track the loss of catalyst reactivity. Based on data collected for the samples, the operator shall appropriately plan for the addition of catalyst or the replacement of catalyst as necessary to ensure compliance with the emissions standards of this permit. Within 60 days of determining the catalyst reactivity, the permittee shall submit a report to the Compliance Authority summarizing the results, the general trend of catalyst reactivity, all CO emissions tests and plans for adding or replacing catalyst. 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, 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. 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.]

There are no changes to paragraphs (b) and (c).

26. Tests Prior to Permit Renewal: 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. Provided compliance is demonstrated with the CO emissions standards, subsequent compliance tests for VOC emissions are not required. Testing for ammonia slip meeting the requirements of Condition 25 (above) "Annual Performance Tests" 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. [Rule 62-297.310(7)(a)3, F.A.C.]

Friday, Barbara

To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC
Attachments: 0490340010AC-011AVCombinedWrittenNoticeofIntent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". **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/0490340.010.AC.D_pdf.zip

Attention: Jeff Koerner

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.

Facility Name: MIDULLA GENERATING STATION

Project Number: 0490340-010-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

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/eproducts/apds/default.asp>.

Permit project documents 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 at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)921-9524

Friday, Barbara

From: Exchange Administrator
Sent: Monday, January 26, 2009 12:56 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT127400.txt; SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

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.

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

Friday, Barbara

From: Juan Ramirez [JRamirez@seminole-electric.com]
Sent: Monday, January 26, 2009 1:00 PM
To: Friday, Barbara
Subject: Re: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATINGSTATION;
0490340-010-AC

Received. Thanks,

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

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 1/26/2009 12:55 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". **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/0490340.010.AC.D_pdf.zip

Attention: Jeff Koerner

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-010-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: HARDEE

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Permit project documents 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 at (850)488-0114.

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 destroy all copies of the original message.

Friday, Barbara

From: Exchange Administrator
Sent: Monday, January 26, 2009 12:56 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT127397.txt; SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

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: Monday, January 26, 2009 1:06 PM
To: Friday, Barbara
Subject: RE: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

Barbara,

I have received and can view the documents provided.

Thanks.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, January 26, 2009 12:55 PM
To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

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". **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/0490340.010.AC.D_pdf.zip

Attention: Jeff Koerner

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: MIDULLA GENERATING STATION
Project Number: 0490340-010-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: HARDEE

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Permit project documents 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 at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)921-9524

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Friday, Barbara

From: System Administrator
To: Halpin, Mike
Sent: Monday, January 26, 2009 12:55 PM
Subject: Delivered:SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

Your message

To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC
Sent: 1/26/2009 12:55 PM

was delivered to the following recipient(s):

Halpin, Mike on 1/26/2009 12:55 PM

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Monday, January 26, 2009 12:58 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

Your message

To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC
Sent: 1/26/2009 12:55 PM

was read on 1/26/2009 12:58 PM.

Friday, Barbara

From: System Administrator
To: Koerner, Jeff; Zhang-Torres; Gibson, Victoria
Sent: Monday, January 26, 2009 12:55 PM
Subject: Delivered:SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

Your message

To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC
Sent: 1/26/2009 12:55 PM

was delivered to the following recipient(s):

Koerner, Jeff on 1/26/2009 12:55 PM
Zhang-Torres on 1/26/2009 12:55 PM
Gibson, Victoria on 1/26/2009 12:55 PM

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Monday, January 26, 2009 1:06 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

Your message

To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC
Sent: 1/26/2009 12:55 PM

was read on 1/26/2009 1:06 PM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Monday, January 26, 2009 12:56 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 497DF926_31930_1191_1 4F4B41DC009

<abrams.heather@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 497DF926_31930_1191_1 4F4B41DC009

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Monday, January 26, 2009 12:56 PM
Subject: Read: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC

Your message

To: Mike Roddy
Cc: Juan Ramirez; whentze@seminole-electric.com; Tom Davis; Halpin, Mike; Zhang-Torres; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff
Subject: SEMINOLE ELECTRIC COOPERATIVE, INC. - MIDULLA GENERATING STATION; 0490340-010-AC
Sent: 1/26/2009 12:55 PM

was read on 1/26/2009 12:56 PM.



August 12, 2008

RECEIVED

AUG 13 2008

BUREAU OF AIR REGULATION

Mr. Jeff Koerner, P.E.
Professional Engineer Administrator
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 23
Tallahassee, Florida 32301

Re: Midulla Generating Station
Title V Air Operation FINAL Permit No.: 0490340-006-AV
Air Construction Permit PSD-FL-344
Request for Permit Revision, Pratt & Whitney FT8-3 Peakers Heat Input

Dear Mr. Koerner:

Project No.: 0490340-011-AV
PSD-FL-344A/24E 0490340-010-AC

Seminole Electric Cooperative, Inc. (Seminole) operates the Midulla Generating Station (MGS) located in Bowling Green, Hardee County, Florida. The MGS includes five (5) simple-cycle Pratt & Whitney (P&W) FT8-3 TwinPac combustion turbine (CT) peaking units; i.e., CT-4A & B, CT-5A & B, CT-6A & B, CT-7A & B, and CT-8A & B.

The Department issued Air Construction Permit No. PSD-FL-344 on June 29, 2005 authorizing construction and initial operation of the P&W peaking units. Title V Air Operation Permit No. 0490340-006-AV was last renewed and became effective on December 13, 2007, authorizing continuing operation of the MGS. The purpose of this letter is to request a concurrent revision to these two permits to allow for an increase in permitted capacity for the P&W FT8-3 CTs.

When firing natural gas, Section III, Condition B.1. of Final Permit No. 0490340-006-AV limits the TwinPac unit (i.e., two CTs) heat input to 635.6 million British thermal units per hour on a higher heating value basis (MMBtu/hr, HHV) at a compressor inlet temperature of 50°F and full load operation. During distillate oil firing, the TwinPac unit heat input is limited to 576.8 MMBtu/hr, HHV under the same operating conditions, but with a compressor inlet air temperature of 78°F. The corresponding heat input limitations are contained in Specific Condition No. 4 of Air Construction Permit No. PSD-FL-344. Operational data for the CTs indicates that these maximum heat inputs, which were based on P&W projections, underestimate the fuel consumption of the units by 6.2% for natural gas firing, and by 5.0% for distillate oil firing.

Accordingly, Seminole requests revisions to Final Permit No.: 0490340-006-AV, Section III Condition B.1. and Air Construction Permit No. PSD-FL-344, Specific Condition No. 4 to allow maximum heat inputs for each Twin Pac unit of 676.2 MMBtu/hr at 55.4 °F and 606.6 MMBtu/hr at 85.1 °F, HHV for gas and oil firing, respectively. Both heat input rates are also at a relative humidity of 80 percent, ambient air pressure of 14.63 psia, and baseload operation. The requested heat input

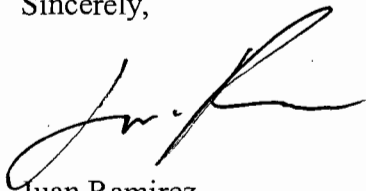
Mr. Jeff Koerner, P.E.
July 30, 2008
Page 2 of 2

values reflect the maximum rates at baseload over the ambient temperature operating range of the CTs based on data recently provided by P&W. Seminole does not request any other revisions to Final Permit No.: 0490340-006-AV or Air Construction Permit No. PSD-FL-344. The P&W peaking units will continue to comply with all of the current emission limitations and standards specified by Final Permit No. 0490340-006-AV.

In support of this Title V permit revision request, a completed Application for Air Permit - Long Form (Facility Information section only, including Responsible Official and Professional Engineer certifications) is enclosed.

If you have any questions or need additional information, please contact me at (813) 963-0994, Ext. 1219.

Sincerely,

A handwritten signature in black ink, appearing to read 'Juan Ramirez', written in a cursive style.

Juan Ramirez
Senior Environmental Engineer

Enclosures:

2 copies DEP Form No. 62-210.900(1)

Pratt & Whitney FT8-3 Heat Input Curves for Natural Gas and No. 2 Fuel Oil



Department of Environmental Protection

Division of Air Resource Management

RECEIVED

APPLICATION FOR AIR PERMIT - LONG FORM

AUG 13 2008

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Seminole Electric Cooperative, Inc.	
2. Site Name: Midulla Generating Station	
3. Facility Identification Number: 0490340	
4. Facility Location... Street Address or Other Locator: 6695 County Road 663 City: Bowling Green County: Hardee Zip Code: 33834-6817	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Mike Roddy, Manager, Environmental Affairs	
2. Application Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: P.O. Box 272000 City: Tampa State: FL Zip Code: 33688-2000	
3. Application Contact Telephone Numbers... Telephone: (813) 963-0994 ext. 1224 Fax: (813) 264-7906	
4. Application Contact Email Address: wmroddy@seminole-electric.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable): 344A/214E
2. Project Number(s): 0490340-012-AV 0490340-013-AC	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Operation of the Seminole Electric Cooperative, Inc. (SECI) Midulla Generating Station Pratt & Whitney (P&W) FT8-3 TwinPac combustion turbine (CT) peaking units is currently authorized by Department Prevention of Significant Deterioration (PSD) Permit PSD-FL-344 (issued on June 29, 2005) and Title V Air Operation Permit FINAL Permit No. 0490340-006-AV (effective date of December 13, 2007).

The purpose of this application is to request revisions to Final Permit No.: 0490340-006-AV, Section III Condition B.1. and Air Construction Permit No. PSD-FL-344, Specific Condition No. 4 to allow maximum heat inputs for each TwinPac unit of 676.2 MMBtu/hr at 55.4 °F and 606.6 MMBtu/hr at 85.1 °F, HHV for gas and oil firing, respectively. Please see accompanying cover letter.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
005	TwinPac Simple Cycle Unit CT4A and CT4B	N/A	N/A
006	TwinPac Simple Cycle Unit CT5A and CT5B	N/A	N/A
007	TwinPac Simple Cycle Unit CT6A and CT6B	N/A	N/A
008	TwinPac Simple Cycle Unit CT7A and CT7B	N/A	N/A
009	TwinPac Simple Cycle Unit CT8A and CT8B	N/A	N/A

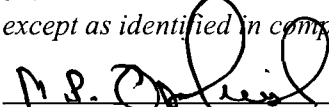
Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

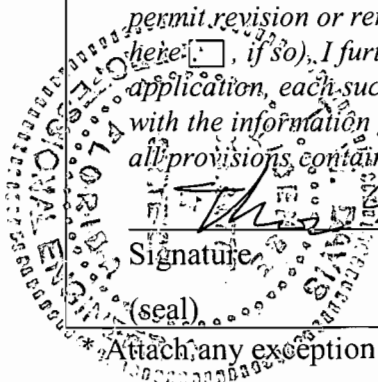
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Michael Opalinski, Vice President of Technical Services
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: P.O. Box 272000 City: Tampa State: FL Zip Code: 33688-2000
4. Application Responsible Official Telephone Numbers... Telephone: (813) 963-0994 ext. 1233 Fax: (813) 228-1308
5. Application Responsible Official Email Address: mopalinski@seminole-electric.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>8/11/08</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address... Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 Northwest 98th Street City: Gainesville State: Florida Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers... Telephone: (352) 332-0444 ext. Fax: (352) 332-6722
4. Professional Engineer Email Address: tdavis@ectinc.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  _____ Signature Date <u>8/5/08</u>

Attach any exception to certification statement.

Figure 9460_Gas Fuel: 07/05/08
Seminole Power SwiftPac's - 0302
Est. Max Heat Input vs. Ambient Temp
FT8-3 Swift Pac, Gas Fuel, WI to 25/42 ppm NOx, 72.290 60Hz, 13.8 kV
14.63 psia, 80 % RH, 2.5 inch H2O inlet loss, 5.0 inch exhaust loss

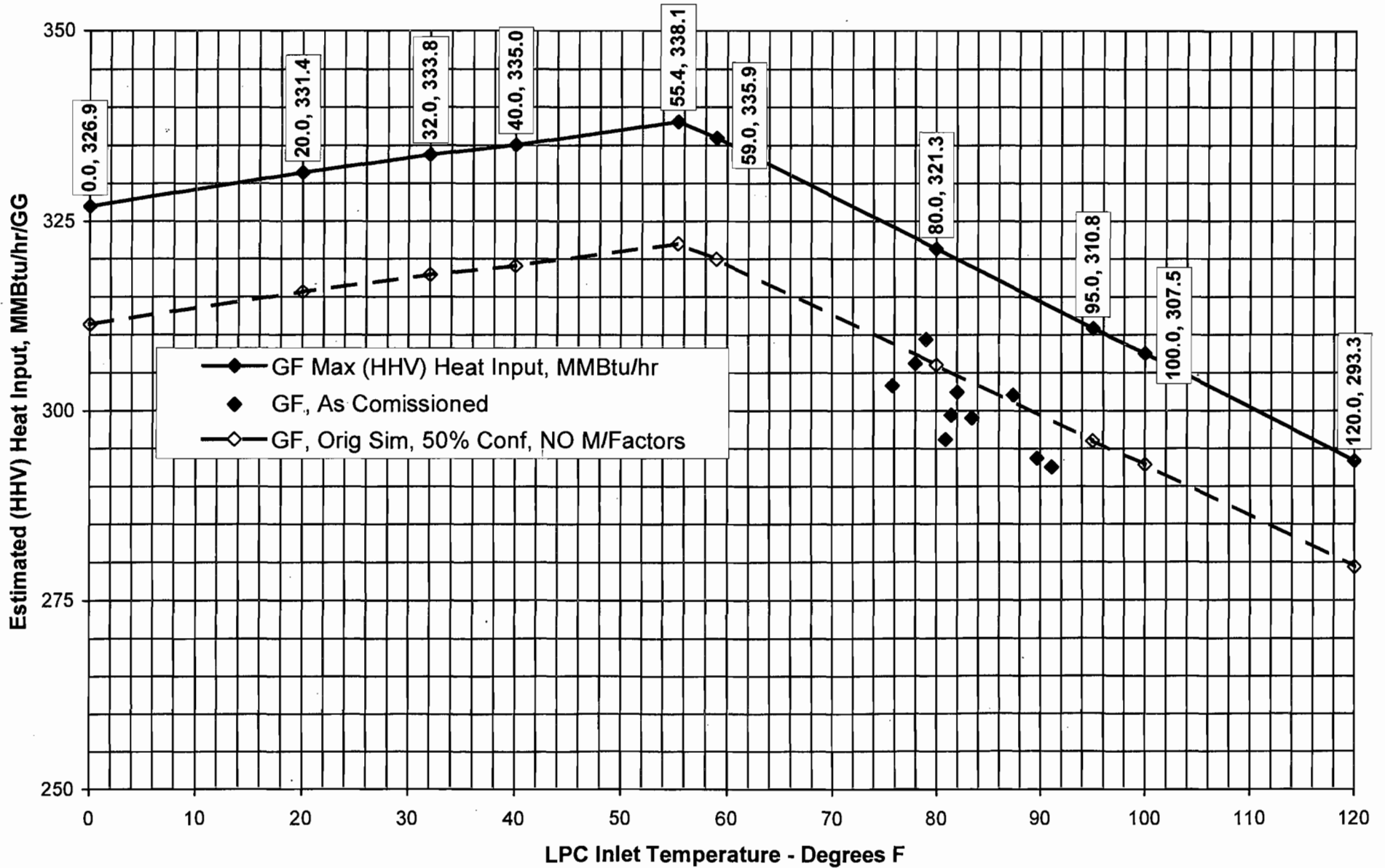
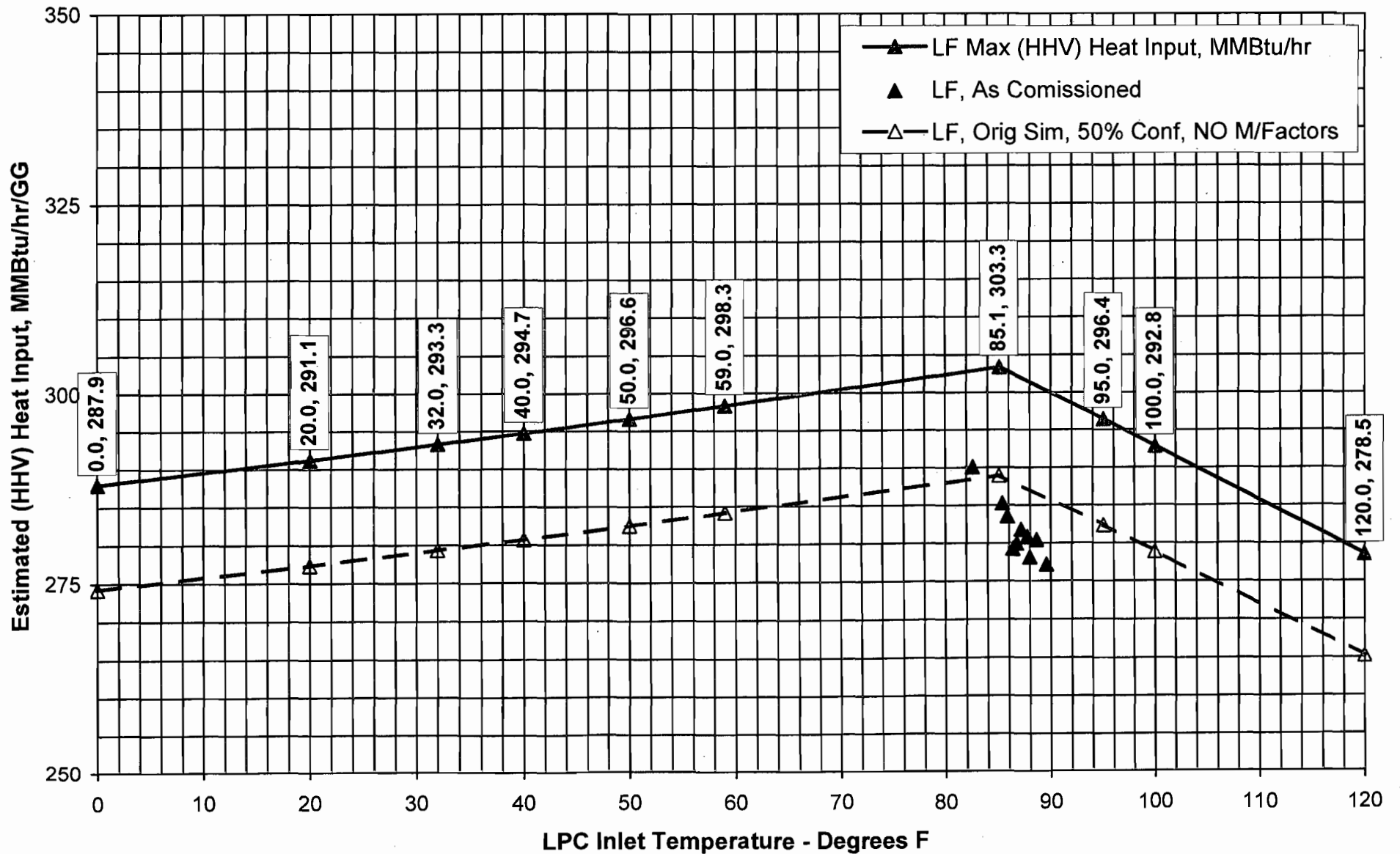
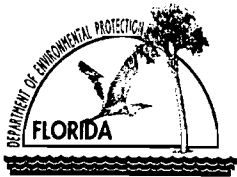


Figure 9460_Liquid Fuel: 07/05/08
Seminole Power SwiftPac's - 0302
Est. Max Heat Input vs. Ambient Temp
FT8-3 Swift Pac, Gas Fuel, WI to 25/42 ppm NOx, 72.290 60Hz, 13.8 kV
14.63 psia, 80 % RH, 2.5 inch H2O inlet loss, 5.0 inch exhaust loss





Department of Environmental Protection

RECEIVED

JUN 30 2008

Division of Air Resource Management

BUREAU OF AIR REGULATION

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Seminole Electric Cooperative, Inc.	
2. Site Name: Midulla Generating Station	
3. Facility Identification Number: 0490340	
4. Facility Location...: Street Address or Other Locator: 6697 County Road 663 City: Bowling Green County: Hardee Zip Code: 33834	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Juan Ramirez	
2. Application Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427	
3. Application Contact Telephone Numbers... Telephone: (813) 739-1219 ext. Fax: (813) 264-7906	
4. Application Contact Email Address: jramirez@seminole-electric.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 6/9/08	3. PSD Number (if applicable): 344A/DNE
2. Project Number(s): 0490340-010A	4. Siting Number (if applicable):

0490340-011-AV Additional Info for these projects

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Seminole Electric Cooperative, Inc. (SECI) requests revisions to Midulla Generating Station (MGS) PSD Permit No. PSD-FL- 344 and Title V Air Operation Permit No. 0490340-006-AV with respect to Units CT4A – CT8B (EU IDs 005 through 009) to: (a) remove the requirement to conduct an annual stack test for CO upstream of the oxidation catalyst system, and (b) remove the requirement to conduct performance tests for volatile organic compounds (VOCs) prior to air operation permit renewal consistent with Department permits for similar facilities. Please see SECI letter to the Department (Ms. Trina Vielhauer) dated May 13, 2008.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
005	Twin Pac Simple Cycle Set (CT4A and CT4B)	N/A	N/A
006	Twin Pac Simple Cycle Set (CT5A and CT5B)	N/A	N/A
007	Twin Pac Simple Cycle Set (CT6A and CT6B)	N/A	N/A
008	Twin Pac Simple Cycle Set (CT7A and CT7B)	N/A	N/A
009	Twin Pac Simple Cycle Set (CT8A and CT8B)	N/A	N/A

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

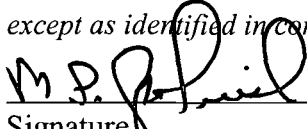
Owner/Authorized Representative Statement **NOT APPLICABLE**
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name:
2. Owner/Authorized Representative Mailing Address Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers Telephone: ext. Fax:
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature Date

APPLICATION INFORMATION

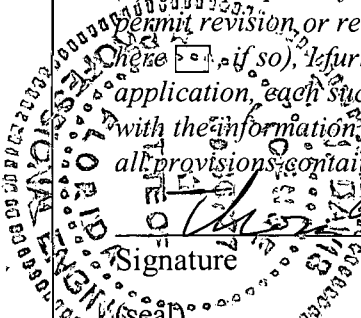
Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name: Michael P. Opalinski, Sr. Vice President of Strategic Services
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427
4. Application Responsible Official Telephone Numbers... Telephone: (813) 963-0994 ext.1233 Fax: (813) 264-7906
5. Application Responsible Official E-mail Address: mopalinski@seminole-electric.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>6/26/08</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address... Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 Northwest 98th Street City: Gainesville State: Florida Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers... Telephone: (352) 332 - 0444 ext. Fax: (352) 332 - 6722
4. Professional Engineer Email Address: tdavis@ectinc.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  _____ Signature 6/25/08 _____ Date

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 365.70 North (km) 3,292.60		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: 4	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Walt Hentze, Plant Manager
2. Facility Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 6697 County Road 663 City: Bowling Green State: FL Zip Code: 33834
3. Facility Contact Telephone Numbers: Telephone: (863) 375-2828 ext. Fax: (863) 375-3100
4. Facility Contact Email Address: whentze@seminole-electric.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official E-mail Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input checked="" type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: NSPS for Stationary Gas Turbines (40 CFR Part 60 Subpart GG applies to Emission Units 005 through 009.	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
NOX	A	N
SO2	A	N
CO	A	N
PM10	A	N
PM	A	N
SAM	B	N
VOC	B	N
H021 (Beryllium Compounds)	B	N
H015 (Arsenic Compounds)	B	N
HAPS (Total)	SM	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps **NOT APPLICABLE**

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: June 2007
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: June 2007
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: June 2007

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: See SECI letter dated May 13, 2008.
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications **NOT APPLICABLE**

1. List of Exempt Emissions Units:
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
 Attached, Document ID:
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
 Not Applicable
4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____
 Equipment/Activities Onsite but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: **See SECI letter dated May 13, 2008.** Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: _____ Previously Submitted, Date: June 2007

Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: _____ Previously Submitted, Date: May 2008

Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not a Hg Budget unit)

Additional Requirements Comment



RECEIVED

FEB 10 2009

BUREAU OF AIR REGULATION

February 5, 2009

Mr. Jeff Koerner
Bureau of Air Regulation – New Source Review Section
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, MS5505
Tallahassee, FL 32399-2400

**Re: Midulla Generating Station (0490340-011 -AV) and (0490340-010-AC)
Proof of Public Notice for the Revision of a Title V Air Permit and Air
Construction Permit.**

Dear Mr. Koerner:

Enclosed you will find the required proof of public notice for the incorporation of the permit changes to the Midulla Generating Station's Title V permit and Air Construction Permit.

If you have any questions or need additional information, please contact me at (813) 739-1219.

Sincerely,

Juan Ramirez
Senior Environmental Engineer

Enclosures: Public Notice from the Wauchula Herald-Advocate

AFFIDAVIT OF PUBLICATION

The Herald-Advocate

Published Weekly at Wauchula, Florida

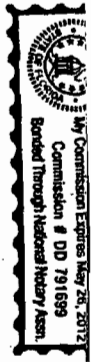
STATE OF FLORIDA,
COUNTY OF HARDEE

Before the undersigned authority personally appeared Kim Reas
who on oath says he is the Secretary of The Herald-Advocate, a
newspaper published at Wauchula, in Hardee County, Florida; that the attached copy of advertise-
ment, being a Public Notice
in the matter of Intent to issue Air permits
in the _____ Court, was published in said newspaper in the issues
of Jan. 29, 2009

Affiant further says that the said Herald-Advocate is a newspaper published at Wauchula, in
said Hardee County, Florida, and that the said newspaper has heretofore been continuously published
in said Hardee County, Florida, each week and has been entered as second class mail matter at the
post office in Wauchula, in said Hardee County, Florida, for a period of one year next preceding the
publication of the attached copy of advertisement; and affiant further says that he has neither paid nor
promised any person, firm or corporation any discount, rebate, commission or refund for the purpose
of securing this advertisement for publication in the said newspaper.

[Signature]

Sworn to and subscribed before me this 30th day of January
A.D. 20 09
Nancy P. Davis
Notary Public
My Commission Expires May 26, 20 12



PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection

Notice of Intent to Issue Air Permits Seminole Electric Cooperative, Inc., Midulla Generating Station

Draft/Proposed Permit No. 0490340-011-AV, Title V Air Permit Revisions
Draft Permit No. 0490340-010-AC, Air Construction Permit Revisions

Applicant: The applicant for this project is Seminole Electric Cooperative, Inc. The applicant's responsible official is Mr. Mike Roddy, the Manager of Environmental Affairs for Seminole Electric Cooperative, Inc. The applicant's mailing address is P.O. Box 272000, Tampa, Florida 33688-2000.

Facility Location: Seminole Electric Cooperative, Inc. operates the Midulla Generating Station, which is an existing electrical generating plant 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: Project No. 0490340-010-AC (PSD-FL-214E and PSD-FL-344B) will revise original air construction permit PSD-FL-214 for the existing two combined cycle combustion turbines (Units 1 and 2) and revise original air construction permit PSD-FL-344 for the existing five sets of simple cycle combustion turbines (CT-4A to CT-8B). These projects were subject to preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD) of Air Quality. Original air construction Permit No. PSD-FL-214 (Units 1 and 2) will be revised to: replace the current sulfuric acid mist emission limits with a fuel sulfur limitation; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. Original air construction Permit No. PSD-FL-344 (CT-4A to CT-8B) will be revised to: increase the maximum heat input rate when firing natural gas from 65.6 to 676.2 MMBtu/hour; increase the maximum heat input rate when firing distillate oil from 576.8 to 606.6 MMBtu/hour; and establish the carbon monoxide emissions standard as a surrogate for volatile organic compounds. The changes in maximum heat input rates are to reflect the actual installed capabilities of the equipment as documented by the manufacturer, Pratt & Whitney.

Project No. 0490340-011-AV will revise existing Title V air operation Permit No. 0490340-006-AV to incorporate the changes proposed in Project No. 0490340-010-AC. In addition, Project No. 0490340-011-AV will incorporate the final changes made in previously issued final Permit No. 0490340-012-AC for the existing five Twin Pac simple cycle combustion turbines. That final project replaced the requirement to conduct annual compliance tests for carbon monoxide upstream of the oxidation catalyst systems with a requirement to conduct periodic tests to determine the reactivity of the oxidation catalyst.

Details of the projects are provided in the attached documents.

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, F.A.C. Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction permits and Title V air operation permits. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Florida Department of Environmental Protection's Division of Air Resource Management. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone 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 address indicated above for the Permitting Authority. The complete project file includes the draft and draft/proposed permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. The draft/proposed permit documents can be viewed at: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Permits with Parallel Review by EPA: The Permitting Authority gives notice of its intent to issue a draft air construction permit revision and a concurrent draft/proposed Title V air operation permit revision for the projects described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable 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 final permits in accordance with the conditions of the draft/proposed Permits 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 EPA has agreed to treat the draft 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 (parallel review). 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 will be posted on the Florida Department of Environmental Protection's website.



Department of Environmental Protection

RECEIVED

Division of Air Resource Management

JUN 09 2008

APPLICATION FOR AIR PERMIT - LONG FORM BUREAU OF AIR REGULATION

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
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- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Seminole Electric Cooperative, Inc.	
2. Site Name: Midulla Generating Station	
3. Facility Identification Number: 0490340	
4. Facility Location...: Street Address or Other Locator: 6697 County Road 663 City: Bowling Green County: Hardee Zip Code: 33834	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Juan Ramirez	
2. Application Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427	
3. Application Contact Telephone Numbers... Telephone: (813) 739-1219 ext. Fax: (813) 264-7906	
4. Application Contact Email Address: jramirez@seminole-electric.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s): 0490340-010-AC	4. Siting Number (if applicable):

0490340-011-AV

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

SECI requests revisions of Midulla Generating Station (MGS) PSD Permit No. PSD-FL-214D and Title V Air Operation Permit No. 0490340-006-AV with respect to Units 1 and 2 to: (a) replace the current sulfuric acid mist (H₂SO₄) mist emission limits with maximum fuel sulfur content limits, and (b) remove the requirement to conduct an annual stack test for volatile organic compounds (VOC) and H₂SO₄ mist consistent with Department permits for similar facilities.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	Combined Cycle Unit 1	N/A	N/A
002	Combined Cycle Unit 2	N/A	N/A

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement **NOT APPLICABLE**

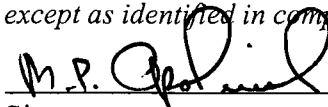
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name:
2. Owner/Authorized Representative Mailing Address Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers Telephone: ext. Fax:
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature Date

APPLICATION INFORMATION

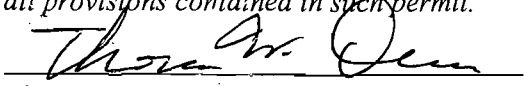
Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Michael P. Opalinski, Sr. Vice President of Strategic Services
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427
4. Application Responsible Official Telephone Numbers... Telephone: (813) 963-0994 ext.1233 Fax: (813) 264-7906
5. Application Responsible Official E-mail Address: mopalinski@seminole-electric.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  _____ Signature 5/23/08 _____ Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address... Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 Northwest 98th Street City: Gainesville State: Florida Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers... Telephone: (352) 332 - 0444 ext. Fax: (352) 332 - 6722
4. Professional Engineer Email Address: tdavis@ectinc.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature <u>5/21/08</u> Date (seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 365.70 North (km) 3,292.60		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: 4	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Walt Hentze, Plant Manager
2. Facility Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 6697 County Road 663 City: Bowling Green State: FL Zip Code: 33834
3. Facility Contact Telephone Numbers: Telephone: (863) 375-2828 ext. Fax: (863) 375-3100
4. Facility Contact Email Address: whentze@seminole-electric.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official E-mail Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input checked="" type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: NSPS for Stationary Gas Turbines (40 CFR Part 60 Subpart GG applies to Units 1 and 2.	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
NOX	A	N
SO2	A	N
CO	A	N
PM10	A	N
PM	A	N
SAM	B	N
VOC	B	N
H021 (Beryllium Compounds)	B	N
H015 (Arsenic Compounds)	B	N
HAPS (Total)	SM	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps **NOT APPLICABLE**

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: June 2007
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: June 2007
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: June 2007

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: See SECI letter dated May 13, 2008.
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications **NOT APPLICABLE**

1. List of Exempt Emissions Units:
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
 Not Applicable
4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____
 Equipment/Activities Onsite but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: **See SECI letter dated May 13, 2008.** Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

- Attached, Document ID: _____ Previously Submitted, Date: **June 2007**
 Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

- Attached, Document ID: _____ Previously Submitted, Date: _____
 Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

- Attached, Document ID: _____ Previously Submitted, Date: _____
 Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

- Attached, Document ID: _____ Previously Submitted, Date: **May 2008**
 Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):

- Attached, Document ID: _____ Previously Submitted, Date: _____
 Not Applicable (not a Hg Budget unit)

Additional Requirements Comment