From:	Juan Ramirez
To:	Holtom, Jonathan
Cc:	Heron, Teresa; Roddy, Mike
Subject:	RE: Comments to 0490340-016-AV, Seminole Electric Cooperative, Inc., Midulla Generating Station, Notice of Draft/Proposed Permit
Date:	Wednesday, October 31, 2012 2:26:43 PM
Attachments:	MGS CAIR Part - Revised October 2012_signed.pdf MGS Acid Rain Part - Revised October 2012_Signed.pdf

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Jonathan,

Attached please find CAIR and Acid Rain forms with corrections.

Thanks,

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

>>> "Holtom, Jonathan" <Jonathan.Holtom@dep.state.fl.us> 10/31/2012 8:50 AM >>>

Good Morning Juan,

Teresa is working on the final permit determination for the Midulla renewal and is making administrative corrections based on your comments. She is correcting the emissions unit identifications listed in the Acid Rain and CAIR sections of the permit to match your comments 9 and 10. When you and I discussed these minor corrections, we determined that correcting the identifiers would not be a significant change, but that it would make our summary tables not match the information listed on your Acid Rain and CAIR forms. If you could please go ahead and send us corrected copies of the forms, we can include them in the final permit to remove the conflicting information. Thank you for your help!

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
(850) 717-9079
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Email: jon.holtom@dep.state.fl.us

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.

From: Juan Ramirez [mailto:JRamirez@seminole-electric.com]
Sent: Tuesday, October 16, 2012 4:29 PM
To: Holtom, Jonathan
Cc: Mike Roddy
Subject: Re: Comments to 0490340-016-AV, Seminole Electric Cooperative, Inc., Midulla Generating Station, Notice of Draft/Proposed Permit

Jonathan,

Correction on #3. Should say emergency not non emergency

--Juan

>>> Juan Ramirez 10/16/2012 2:41 PM >>>
Jonathan,

We have a few minor comments for the MGS draft permit:

1. Page 2 of 35: the description of the diesel engines is not correct. the use of "wastewater treatment plant" terminology should be removed throughout the document. These engines are for the power plant.
2. Page 4 of 35 the "wastewater treatment plant" terminology should be removed.
3. Throughout the document the use of "non-emergency" should be used to describe "emergency" when referring to 1,528 HP engine.
4. Page 11 of 35, Condition A.30a. – should say "If NOx <u>excess</u> emissions exceed six hours……"
5. Page 13, of 35, the description for the twin-pacs, last sentence is repeated.
6. Page 15, Condition B.13: Current TV permit does not include a corresponding condition with VOC limits – just a table for informational purposes (this may have been an oversight in prior TV permits).

7. Page 16, Condition B.16: Since the Part 75 Monitoring Plan (MP) has already been submitted, could we delete language that refers to the MP.

8. Pages 20-22: These conditions cite various provisions of NESHAPS Subpart ZZZZ for the diesel engines. Not sure if there is a way to accommodate this, but if Subpart ZZZZ changes would need to re-open the TV permit to include the changes? A permit condition that automatically incorporates future changes to Subpart ZZZZ would be beneficial.

9. Page 27 of 35, EPA Unit ID for emission units 001 and 002 should be 1 and 2 not 1A and 1B.

10. Page 28 of 35, CAIR Part – units 2A, 2B and 3A, 3B are included. These should be deleted. Unit ID for 1A and 1B should be corrected here as well.

Minor clarifications in the Statement of Basis:

1. Willim M. Roddy is the Director of Environmental Affairs

2. The picture is of Seminole Generating Station and not Midulla Generating Station.

Thanks for all your help.

Sincerely,

Juan Ramirez
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