Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Seminole Electrical Cooperative, Inc.
890 North U.S. Highway 17
Palatka, FL 32177-8647

Authorized Representative:
James Frauen, Vice President of Technical Services and Development

Air Permit No. 1070025-026-AC
Permit Expires: 12/31/2019
Minor Air Construction Permit
Seminole Generating Station
Dry Fogging Project

PROJECT

This is the final air construction permit, which authorizes the installation of a dry fogging dust suppression system at three transfer points (CH 002, U- 001, and U 002) used during coal handling and storage. The proposed work will be conducted at the existing Seminole Generating Station, which is a power plant categorized under Standard Industrial Classification No. 4911. The existing facility is located in Putnam County at 890 North U.S. Highway 17 in Palatka, Florida. The UTM coordinates are Zone 17,438.8 kilometers (km) East and 3289.2 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

David Lyle Read, P.E.

David Lyle Read, P.E.
2016.12.14 12:38:06 -05'00'

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance

Florida Department of Environmental Protection

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Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package 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 the date indicated below to the following persons.

James Frauen, Seminole Electric (jfrauen@seminole-electric.com)
Justin Gostnell, Seminole Electric (JGostnell@seminole-electric.com)
William Karl, ECT (bkarl@ectinc.com)
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Ms. Alisa Coe, Earth Justice: acoe@earthjustice.org
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Ms. Lynn Scearce, DEP OPC: lynn.scearce@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.

Lynn Scearce

2016.12.15
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FACILITY DESCRIPTION

This existing facility consists of: two coal-fired, dry-bottom wall-fired utility boilers (Unit Nos. 1 and 2) and associated steam turbines; a coal storage yard; limestone, wet scrubber sludge and ash handling and storage; emergency equipment (an emergency generator & a fire water pump); general plant fugitive emissions; and, ancillary support equipment.

Each utility boiler is equipped with the following air pollution control equipment: an electrostatic precipitator (ESP) to control particulate matter (PM) emissions; an upgraded wet limestone flue gas desulphurization (FGD) system to control sulfur dioxide (SO_2) emissions; a low-NO_X burner (LNB) system, low excess air firing and a selective catalytic reduction (SCR) system to control nitrogen oxide (NO_X) emissions; and, an inactive alkali injection system. The alkali injection system is not required to meet current sulfuric acid mist (SAM) emissions limits but will be available for use if needed. Each utility boiler is equipped with continuous emission monitoring systems (CEMS) to measure and record SO_2, NO_X, & carbon dioxide (CO_2) emissions as well as a continuous opacity monitoring system (COMS) to measure and record the opacity of the exhaust gas. Also at the facility are miscellaneous insignificant emissions units and/or activities.

The existing facility consists of the following emissions units.

Facility ID No. 1070025	
ID No.	**Emission Unit Description**
Regulated Emissions Units	
001	Steam Electric Generator No. 1
002	Steam Electric Generator No. 2
004	Coal Storage Yard
005	Limestone and Wet Scrubber Sludge Handling and Storage
Unregulated Emissions Units and/or Activities	
	Engine(s)
006	Emergency Equipment- Emergency Generator
007	Emergency Equipment- Fire Water Pump
008	General Plant Fugitive Emissions

PROPOSED PROJECT

On October 14, 2016, Seminole Electric Cooperative, Inc. (SECI) submitted an application (Link to application) to the department, requesting to replace the baghouses in the coal storage yard with a dry fogging dust suppression system. The purpose of the dry fogging dust suppression system is to control particulate matter emissions.

This project will modify the following emissions units.

Facility ID No. 1070025	
ID No.	**Emission Unit Description**
004	Coal Storage Yard
005	Limestone, Wet Scrubber Sludge and Ash Handling and Storage Activities

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).

- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility does operate units subject to the New Source Performance Standards (NSPS) of Title 40 Code of Federal Regulations Part 60 (40 CFR 60).
- The facility does operate units subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256-7590.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation: Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit. [Rule 62-212.400(12), F.A.C.]

9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

A. EU 004, Coal Handling and Storage Activities

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
004	Coal Handling and Storage Activities

The coal receiving, storage and transfer systems at the coal storage yard support the operation of the two power boilers. The coal storage yard began commercial operation in 1985. Particulate matter emissions are controlled at the "as-received transfer tower," the "as-fired transfer tower" and the conveyors to the silos by fabric filter systems. Water sprays (being replaced with a dry fogging dust suppression system), full enclosures or partial enclosures are also utilized as appropriate.

The facility is authorized to use RAMSORB 200 as a wet coal additive to absorb moisture and keep the coal from clumping. The additive consists of sodium polyacrylate, which is a non-hazardous material. Approximately 4 pounds of RAMSORB 200 per ton of coal is typically applied to improve handling. This activity was determined to be exempt from the requirement to obtain an air construction permit in Project No. 1070025-010-AC.

{Permitting note: This emissions unit is regulated under: 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants, adopted and incorporated by reference in Rule 62-204.800(8)(b)33, F.A.C.; and, Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) [PSD-FL-018, as amended]; and, Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT

2. Dry Fogging Dust Suppression System: The permittee is authorized to install a Dry Fogging Dust Suppression System, manufactured by Dust Solutions Inc at three transfer points (CH 002, U- 001, and U 002) of this emission unit. [Application No. 1070025-026-AC]

PERFORMANCE RESTRICTIONS

3. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

TESTING REQUIREMENTS

4. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the 20-percent emissions standards for Visible Emissions. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) & 62-297.310(8)(b)1, F.A.C.; and Application No. 1070025-026-AC]

5. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.]

6. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of Fugitive Emissions From Material Sources and Smoke Emissions From Flares

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

7. Operations: The permittee shall operate and maintain the dry fogging dust suppression system in accordance with the manufacturer's Operation & Maintenance (O&M) Manual. [Application No. 1070025-026-AC and Rule 62-4.070(3), F.A.C.]

RECORDKEEPING

8. Recordkeeping: The permittee shall maintain a copy of the O&M Manual for the dry fogging dust suppression system on-site. [Application No. 1070025-026-AC; and, Rule 62-4.070(3), F.A.C.]

B. EU 005, Limestone, Wet Scrubber Sludge and Ash Handling and Storage Activities

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
005	Limestone, Wet Scrubber Sludge and Ash Handling and Storage Activities

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

PERMITS MODIFIED

Project No. 1070025-018-AC

2. Specific Condition No. 4.:

    4. The truck loadout system shall be designed with either a boot seal that extends to the truck or a misting system to prevent fugitive dust when loading ash into the truck. [Project No. 1070025-018-AC and Application No. 1070025-026-AC]