

Memorandum

Florida Department of
Environmental Protection

TO: Steve Palmer, P.E.
Power Plant Siting Office

FROM: Richard M. Harvey, Director
Division of Water Facilities

DATE: December 15, 1993

SUBJECT: SECI/HARDEE POWER STATION UNIT 3

I understand Seminole Electric seeks a binding agreement to limit the scope of information and methodology the Department may use in processing the referenced Siting Certification Application. This Division vigorously opposes such preemptive agreements for this or any other project.

Binding agreements complicate the completeness, sufficiency, and condition-drafting phases of the siting process. It is impossible to predict all the types of information and methodology that will be needed once the applicant chooses from among project alternatives.

This project in particular involves myriad interconnected water quality and quantity issues which may affect critical water bodies such as Payne Creek, the Peace River, and the Floridan Aquifer. Since alternative sources of cooling water include reuse of reclaimed water (domestic and industrial), water cropping, ground water, and stormwater from nearby mine sites, it is not clear what information will ultimately be needed to determine reasonable assurance for clean water. The air, biological, land and solid waste issues, and the proximity of two large ongoing projects (TECO/Polk and FPC/Polk power plants), add greatly to the complexity.

We must be able to determine whether the proposed project will comply with the rules of the department without having our hands tied by a binding up-front agreement. Complete information, obtained through free inquiry under statutory and rule provisions, is needed for the facilities that will finally be built.

In the event that a binding agreement is executed, we insist that it stipulate a thorough environmental assessment of all possible alternatives.

If you have any questions or need further information, please call Geof Mansfield or Al Rushanan at 487-1855.

RMH/aVr

cc: Richard Donelan
Rick Garrity
Buck Oven

Florida Department of
Environmental Protection

Memorandum

TO: Richard Donelan
Preston Lewis
Tom Rogers
Phil Coram
Al Rushanan
Al Bishop
Trudie Bell
Mary-Jean Yon
Joe Bakker

FROM: Steve Palmer *SAP*
Siting Coordination Office

DATE: October 27, 1993

SUBJECT: Seminole Electric Cooperative Incorporated
Hardee Unit 3, Proposed Plan of Study

RECEIVED

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Division of Air
Resources Management

Attached is a copy of the proposed Plan of Study for Hardee Unit 3 submitted by Seminole Electric Cooperative Incorporated (SECI) on October 26, 1993. SECI plans to meet with Department staff regarding this plan of study in December, 1993.

We will be having an in-house meeting to discuss this proposal at 10:00 on November 15, 1993 in room 272 of the Twin Towers Building. If you or your representative cannot attend this meeting, please call me.

attachment---

cc: Pam McVety
Buck Oven
file



Lawton Chiles
Governor

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 26, 1993

Mr. M.P. Opalinski
Manager of Environmental Affairs
Seminole Electric Cooperative
16313 North Dale Mabry Highway
Tampa, Florida 33688-2000

Dear Mr. Opalinski:

In regards to the Seminole Electric Cooperative, Inc. proposed Hardee Unit 3 construction, I have reviewed your request to use existing ambient monitoring data to fulfill the PSD preconstruction monitoring requirements. In view of the existing monitoring data in the area of the proposed facility and given that this area is similar in nature to the areas where the existing data has been taken, the use of these data may be considered adequate for satisfying the preconstruction monitoring requirements. In using these data, you must show that the data adequately represents existing air quality near the proposed site. This justification should be contained in your air quality analysis report of the PSD application.

The acceptance by the Department to use existing monitoring data to meet the preconstruction monitoring requirements does not preclude the Department from requiring post construction monitoring for some pollutants. If you have any questions or need further clarification please call me at 904/488-0114, or write to me at the letterhead address.

Sincerely,

A handwritten signature in cursive script that reads "Thomas G. Rogers".

Thomas G. Rogers
Administrator

TGR/tr

cc: H. Oven
P. Lewis