

Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

March 7, 2002

Mr. Mike Roddy  
Senior Environmental Engineer  
Seminole Electric Cooperative, Inc.  
16313 N. Dale Mabry Highway  
Tampa, Florida 33688-2000

Re: Recognition Of "Nalco 7899" As A Coal Dust Suppressant (Facility ID #: 1070025)

Dear Mr. Roddy:

We have received your request to begin using a polyvinyl acetate emulsion on your coal as a means of suppressing fugitive dust (Nalco 7899, made by Air Products Polymers, L.P.).

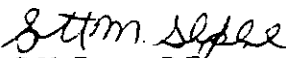
It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-3, condition 57.). This authorization is only valid if the Nalco 7899 is used as a surface coating dust suppressant. We have not reviewed, nor approved, the use of Nalco 7899 as a "glue" for binding coal dust together to form a pellet or briquette. This type of use would require a permit revision to identify a new method of operation. Use of this product is authorized in addition to the use of Latex DL 298NA that was previously authorized on November 20, 2000.

For inspection purposes, please retain on-site a copies of the material safety data sheets (MSDS), a copies of your contracts with the coal supplier specifying the material or materials that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that Nalco 7899 or Latex DL 298NA are the only materials that have been applied to your coal. If Seminole Electric or the coal supplier desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letter head address.

Sincerely,

  
C.H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/jh

cc: Mr. Mike Opalinski, Seminole Electric Cooperative  
Mr. Thomas W. Davis, P.E., ECT  
Mr. Buck Oven, P.E., DEP  
Mr. Chris Kirts, P.E., DEP-NED

"More Protection, Less Process"