



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

March 1, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James R. Frauen, Manager of Environmental Affairs
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, FL 33618

Re: Request for Additional Information
Pollution Controls Upgrade Project
Seminole Generating Station, Units 1 and 2
DEP File 1070025-004-AC

Dear Mr. Frauen:

The Department is in receipt of your application dated February 13th which details several pollution control upgrades planned for Units 1 and 2. In order to continue processing the application, we will need the additional information below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Department notes that on Table B-4 entitled "PSD Netting Analysis", one PSD pollutant (CO) is expected to cause a BACT Review and every other PSD pollutant shows an increase. Please address the following issues relative to Table B-4:

- A. It is unclear which part of the project is responsible for the increase in CO emissions. Please provide specific information on where this increase originates. For example, if the applicant has deemed that the replacement burners will generate the additional CO, the Department will require support for this increase in the way of supplying detailed manufacturer burner specifications for the new as well as existing burners. Upon receipt of such information, the Department will be better positioned to evaluate whether the selected burners meet the Department's BACT Standard for CO emissions.
- B. Contemporaneous Emission Changes are defined in Rule 62-212.500(1)(e)3 as follows:

3. Contemporaneous Emissions Changes. An increase or decrease in the actual emissions, or in the quantifiable fugitive emissions, of a facility is contemporaneous with a particular modification if it occurs within the period beginning five years prior to the date on which the owner or operator of the facility submits a complete application for a permit to modify the facility, and ending on the date on which the owner or operator of the modified facility projects the new or modified facility to begin operation.

Also, Rule 62-210.200(34) defines Baseline Actual Emissions as follows:

(34) "Baseline Actual Emissions" and "Baseline Actual Emissions for PAL" – The rate of emissions, in tons per year, of a PSD pollutant, as follows:

(a) For any existing electric utility steam generating unit, baseline actual emissions means the average rate, in tons per year, at which the unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 5-year period immediately preceding the date a complete permit application is received by the Department. The Department shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

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The Department notes that based upon the above definitions, the Baseline Actual Emissions which are allowable for forming the basis of a netting analysis, cannot precede February 13, 2001; however, emissions for calendar year 2000 have been included within your application. The Department requests that the applicant indicate which 24-month period(s) following January 2001 is to be utilized for the baseline emission calculations of this project.

- C. The following tables compare Departmental AOR records (TPY) of Unit 1 plus Unit 2 emissions to your TPY submittals:

Pollutant	2001		2002		2003		2004		2005	
	Dept.	SECI	Dept.	SECI	Dept.	SECI	Dept.	SECI	Dept.	SECI
SO ₂	29832	29832	24090	24090	27360	27360	26704	26704	???	31444
NO _x	20621	24408	18614	22170	22204	21560	19122	19967	???	23230
CO	2098	2609	2125	2592	3978	5400	2482	4552	???	5375
VOC	108	108	99	99	115	116	96	96	???	96
PM	431	498	664	721	1128	922	660	598	???	685
PM ₁₀	431	498	664	721	1128	922	660	598	???	685

Pollutant	2001 Plus 2002 Avg.		2002 Plus 2003 Avg.		2003 Plus 2004 Avg.		2004 Plus 2005 Avg.	
	Dept.	SECI	Dept.	SECI	Dept.	SECI	Dept.	SECI
SO ₂	26961	26961	25725	25725	27032	27032	???	26704
NO _x	19618	23289	20409	21865	20663	20764	???	19967
CO	2111	2600	3052	3996	3230	4976	???	4552
VOC	104	104	107	108	105	106	???	96
PM	548	610	896	822	894	760	???	598
PM ₁₀	548	610	896	822	894	760	???	598

In summary, after SECI has selected the baseline period(s) from the table above, any TPY values which are shaded, represent areas where the applicant is required to provide further supporting data for the higher than AOR values. If stack test data is utilized (e.g. CO, PM or H₂SO₄), the Department requires that certified summaries of all stack tests conducted during the subject calendar years be submitted; where AP-42 emission factors are utilized, the Department requires calculations along with the supporting data (i.e. annual heat input by fuel type, etc). Where CEMS data is utilized, the Department requires that the applicant provide supporting documentation from EPA's Acid Rain database demonstrating that the data matches. For the year 2005, the DARM/BAR is not in receipt of a copy of the AOR; hence no comparison can be made. Should SECI determine that 2004/2005 represents the baseline period, supporting data shall be required for all 2005 TPY emission data.

2. Please confirm the Department's understanding of the permit limits you are seeking for Units 1 & 2. The Department notes that in order to "carve out" emission reductions so as to make room for Unit 3, federally enforceable permit limits will need to be established for those pollutants where netting is desired.

Pollutant	Current Limit	Proposed Limit
SO ₂	1.20 lb/MMBtu - 30 day rolling	0.67 lb/MMBtu - 30 day rolling
NO _x	0.60 lb/MMBtu - 30 day rolling	0.46 lb/MMBtu - 30 day rolling
PM/PM10	0.03 lb/MMBtu stack test	same
CO	NA	0.146 lb/MMBtu
VOC	NA	0.06 lb/ton coal
SAM	NA	0.096 lb/MMBtu

Please note that EPA and NPS have been copied on your application, and should FDEP receive questions or comments from them, we will forward you a copy.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

If you have any questions, please call Michael P. Halpin, P.E. at 850/921-9519.

Sincerely,



Michael P. Halpin, P.E.
FDEP/DARM
North Permitting Section

Hamilton Oven, DEP-SCO
Chris Kirts, DEP-NED
Scott Osbourn, Golder
PSRC c/o Pillsbury Winthrop Shaw Pittman, LLP

Mr. Jim Frauen
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2. Article
(Trans)

PS Form

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

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PS Form 3800, May 2000

See Reverse for Instructions