Memorandum

Florida Department of Environmental Protection

TO:

Howard L. Rhodes

THRU:

Clair Fancy

Al Linero out 4/2

FROM:

Syed Arif SAlysa;

DATE:

April 23, 1997

SUBJECT:

Seminole Electric Cooperative, Palatka Power Plant. PSD-FL-018(A)

Attached for your approval and signature is a letter that will amend permit number PSD-FL-018(A). The letter will allow co-firing of petroleum coke with coal and increased use of No. 2 fuel oil at its Palatka Power Plant Units No. 1 and 2 in Putnam County.

Seminole Electric will not experience any increases in sulfur dioxide emissions as a result of firing petcoke. The increases are avoided through increased scrubbing. No increases in nitrogen oxides will occur. Additional assurance is provided by Seminole's early opt-in commitment to meet a 0.50 pound per million NOx emission rate. Particulate emissions should be no higher, partly based on the lower ash levels in petcoke. Carbon Monoxide is not expected to increase. For reference, JEA demonstrated that good combustion practices can be adopted to minimize carbon monoxide formation. We believe Seminole will be able to accomplish the same level of control. Finally, we put in provisions which require Seminole to demonstrate for the next five years that firing petcoke does not in fact causes significant increases in any of the mentioned pollutant.

The public notice was published in the Palatka Daily News. No comments were submitted by the EPA, NPS or the public. The applicant submitted a comment concerning the petcoke usage rate with the coal. The applicant's comment was incorporated in the final permit.

I recommend your approval and signature.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an Application for Permit Modification

Mr. M.P. Opalinski Seminole Electric Cooperative Incorporated (SECI) 16313 North Dale Mabry Highway Tampa, Florida 33688 DEP File No. PSD-FL-018(A)

Enclosed is a letter that modifies Permit Number PSD-FL-018(A). This letter allows co-firing of petroleum coke with coal and increased use of No. 2 fuel oil pursuant to 40 CFR 52.21-Prevention of Significant Deterioration (PSD permit). This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-30-97 to the person(s) listed:

Mr. M.P. Opalinski, SECI *

Mr. T.W. Davis, P.E., ECT

Mr. Brian Beals, EPA

Mr. John Bunyak, NPS

Mr. Hamilton Oven, DEP

Mr. Chris Kirts, NED

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

FINAL DETERMINATION

Seminole Electric Cooperative Incorporated

Modification of Permit No. PSD-FL-018(A) Seminole Palatka Power Plant Units 1 and 2

An Intent to Issue an air construction permit modification for Seminole Electric Cooperative, Inc., Palatka Power Plant Units No. 1 & 2 located in Palatka, Putnam County, Florida was distributed on February 10, 1997. The Notice of Intent was published in the Palatka Daily News on February 18, 1997. Copies of the modification were available for public inspection at the Department offices in Jacksonville and Tallahassee.

No comments were submitted by the National Park Service or the U.S. Environmental Protection Agency. A comment was submitted by the applicant concerning the maximum weight of the petroleum coke that shall be burned. The Department concurs with the applicant's comment.

The final action of the Department will be to issue the permit modification as noted above.