



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 25, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. P. Opalinski
Director of Environmental Affairs
Seminole Electric Coop., Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

Re: Seminole Electric Coop., Inc.
Coal and Petcoke Blending at Palatka Plant Units 1 and 2
PA 78-10, PSD-FL-018

Dear Mr. Opalinski:

We received the referenced application for the petroleum coke project at the Palatka. Thank you for providing Marty Costello and me with the tour of the Palatka Plant. The main review engineer, Mr. Arif, will return from his vacation on December 2 and will begin to review the application in depth. In the meantime, we wanted to pass along the following initial comments based on a cursory review conducted by Mr. Martin Costello:

1. Table E5 uses the baseline test data (instead of historic actual emission rates) to estimate emission rate changes for PSD pollutants for which there exists either stack test data or CEMS data. Please submit either 1994 or 1996 and 1995 averaged annual emission rates based on CEMS data for NO_x and SO₂ and based on stack test data for PM and VOC, H₂SO₄ and CO (if only have initial stack test data for CO, VOC, or H₂SO₄, then average this with the baseline test data). For pollutants which have not been tested in the past provide the rating and the date of the AP-42 emission factors. State how AOR emission rates were calculated for SO₂.
2. The emission rates for the three blends are averaged in Table E5. Compare emission rates (TPY) for the 10%, 20% and 30% petcoke blends separately to the historic emission rates referenced in the above question.
3. The application does not provide measured SO₂ emission rates from the test burn. If not provided, please provide all measured emission rates from the test burn.
4. Appendix E states that SECI has demonstrated though past operation up to 95% removal efficiency for SO₂. Please provide date which demonstrates this.

Mr. Mike Opalinski
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With respect to statistical analyses, we do not place much confidence in the Student 't' test particularly when there are few data to compare. Failing to prove that the samples are different (with 95 percent confidence) does necessarily not mean that they are the same.

We understand that you may wish to meet with us in early December. Please contact Ms. Kim Tober at (904)488-1344 to arrange a meeting. If you have any questions regarding this matter, please call Syed Arif (after December 1), Marty Costello, or me at the same phone number.

Sincerely,



A. A. Linero, P.E., Administrator
New Source Review Section

AAL/aal/l

cc: Brian Beals, EPA
John Bunyak, NPS
Buck Oven, DEP
Chris Kirts, NED
Tom Davis, ECT

Memorandum

Florida Department of
Environmental Protection

RECEIVED

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BUREAU OF
AIR REGULATION

TO: Power Plant Siting Review Committee
FROM: Buck Oven, Siting Coordination Office *HSO*
DATE: November 14, 1996
SUBJECT: Seminole Electric Cooperative, PA 78-10, Module 8021
Petcoke Modification

Attached please find a copy of Seminole Electric Cooperative's request for modification of the Conditions of Certification to allow the burning of Petroleum Coke and light oil at their plant near Palatka. Please review and comment on their request and return your comments as soon as practical but no later than December 13, 1996.

Attach: