



October 20, 2004

Mr. Cleve Holladay, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

OCT 22 2004

BUREAU OF AIR REGULATION

RE: Seminole Electric Cooperative, Inc.
DRAFT Title V Permit No. 1070025-002-AV

Dear Mr. Holladay:

On behalf of Seminole Electric Cooperative, Inc. (Seminole), attached are comments regarding the DRAFT Title V permit for the Seminole Power Plant as identified above. Seminole appreciates the Department's efforts in processing our Title V permit and understands the need to resolve any outstanding issues in a timely manner. In this regard, Seminole was granted a Request for an Enlargement of Time until November 1, 2004, to allow the submittal and resolution of comments. If we are unable to reach a resolution of the following comments by this time, we would appreciate the opportunity to file an additional Request for Enlargement of Time.

After you have had a chance to review these comments, please contact me or Mike Roddy at (813) 963-0994.

Sincerely,

Mike Opalinski
Title V Responsible Official

cc: Jim Frauen
Mike Roddy
Trina Vielhauer, DEP
Jim Pennington, DEP
Tom Davis, P.E., ECT
Robert Manning, HGSS

**SEMINOLE ELECTRIC COOPERATIVE
COMMENTS ON DRAFT TITLE V PERMIT
SEMINOLE GENERATING STATION**

General Comments

1. Although we published the public notice provided on October 5, 2004, we question DEP's authority to allow for a "public meeting."

2. Specific Comments are detailed below and are reflected in the attached strike-through/underline version of the draft permit.

Specific Comments

1. Please change the name of the facility to Seminole Generating Station.

2. As indicated in our renewal application, Seminole no longer conducts railcar maintenance at this site. Accordingly, we request that Emission Unit B be deleted from the permit, as well as references to this activity in the Table of Contents, Facility Information and Description, Statement of Basis, etc.

3. In the referenced attachments to the permit, please update the version of Appendix 40 CFR Part 60 to (version dated 7/1/03).

4. Insignificant activities. 20. " Periodic abrasive blasting in permanent enclosure (old railcar maintenance building)."

5. Please update TV-3 to TV-4 throughout the permit.

6. Condition A.20. Add a reference to Condition A.18. at end of sentence, in addition to A.19.

7. Delete Conditions A.69. and A.70. because these conditions have been satisfied and are now obsolete.

8. Delete Conditions A.72. and A.73. because this information is redundant (an FDEP monitoring station is located approximately 1 mile away), these requirements are not federally enforceable, and the equipment has reached the end of its useful life.

9. Condition C.1., add the following language: "The maximum through put rate shall not exceed 3,000 tons per hour for unloading trains and 1,700 tons per hour for reclaim operation."

10. In the permitting note for Condition C.7., clarify the emission points subject to the standard.

11. In the permitting notes for Conditions C.9. and D.9., revise to reflect Seminole's prior submission of an Action Plan.

12. In Condition D.1., revise the unloading or transfer rate to 400 tons per hour.

13. In the description of Emission Unit D, edit to reflect the use of lime rather than quicklime.

14. Acid Rain Part. Revise the allowances to reflect the current amount for each unit to 18,388, and the correct years for this permit.

15. Revise the CAM Plan to reflect the exact agreement reached between Seminole and DEP on September 22, 2004. Specifically the indicator range should read: "An excursion is defined as measured duct opacity greater than 6.5 percent for ten consecutive six minute readings or greater than 12 % opacity for one six minute reading..."



RECEIVED

OCT 21 2004

James K. Pennington, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

**RE: Public Notice of Intent to Issue A Title V Air Operation Permit Renewal
1070025-002-AV**

Dear Mr. Pennington:

Attached is the certified "Proof of Publication" for the Seminole Generating Station Title V Permit Renewal. The Public Notice was published on October 8, 2004.

Sincerely,

Mike Roddy
Senior Environmental Engineer

STATE OF FLORIDA

County of Putnam

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Palatka Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

Public Notice of Intent to Is

Was published in said newspaper 1 time(s) with said publication being made on the following dates:

10/08/2004

The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice and/or advertisement.

Allison Waters

Sworn to and subscribed to before me this 7th day of October, 2004 by Allison Waters, Administrative Assistant, of the Palatka Daily News, a Florida corporation, on behalf of the corporation.

Mary Kaye Wells

Mary Kaye Wells, Notary Public

My commission expires July 22, 2007

Notary Seal
Seal of Office:



Personally known to me, or
Produced identification:
Did take an oath

tronic comments by visiting the following website: <http://www.dep.state.fl.us/air/products/ards/>. A copy of the complete project file is also available at:

Permitting Authority:
Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District:
Department of Environmental
Protection Northeast District
7825 Baymeadows Way, Suite
200B
Jacksonville, Florida 32256-
7577
Telephone: 904/804-3300
Fax: 904/448-4319

Notice of Intent to Issue An Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-265, 62-257, 62-281, 62-298, and 62-297, F.A.C. The Permitting Authority will issue a PROPOSED Permit and subsequent FINAL Permit in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

PUBLIC NOTICE

Public Notice of Intent to Issue A TITLE V AIR OPERATION Permit RENEWAL

Permitting Authority
Department of Environmental
Protection
Bureau of Air Regulation

DRAFT Title V Air Operation
Permit No.: 1070025-002-AV

Seminole Electric Cooperative, Inc.
Seminole Power Plant
Putnam County

Applicant: The applicant for this project is Seminole Electric Cooperative, Inc., Seminole Power Plant, 890 U.S. Highway 17, Palatka, Florida 32177. The applicant's responsible official is: Mr. Michael P. Opalinski, Vice President of Technical Services, Seminole Electric Cooperative, Inc. - Post Office Box 272000, Tampa, Florida 33688.

Facility Location: The applicant operates the Seminole Power Plant, which is an electrical utility plant and located East of U.S. Highway 17, approximately seven miles north of Palatka, Putnam County.

Project: On July 2, 2004, the applicant applied to the Permitting Authority for a Title V air operation permit (Permit). This Permit will be a renewal Permit for this facility. Details of the project are provided in the application and the enclosed "Statement of Basis".

This facility consists of two 714.6 megawatts, electric, coal fired steam electric generators; a coal handling and storage system; a limestone unloading, handling and storage system; a flue gas desulfurization (FGD) sludge stabilization system; and a rail car maintenance facility. Steam Electric Generators No. 2 and No. 1 began commercial operation in 1984 and 1985, respectively. These units are each equipped with an electrostatic precipitator (ESP) to control particulate matter, a wet limestone flue gas desulfurization (FGD) unit to control sulfur dioxide, and low NOX burners and low excess air firing to control nitrogen oxides. Each steam electric generator can fire coal, coal with a maximum of 30 percent petroleum coke (by weight), No. 2 fuel oil, and on-specification used oil. They are regulated under Acid Rain, Phase II and Phase I: NSPS - 40 CFR 60, Subpart D, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; Rule 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD); the Power Plant Siting Act (PPSA); and, Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated August 9, 1978.

The coal receiving, storage and transfer systems at the coal storage yard, which began commercial operation in 1985, are regulated under NSPS - 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; PSD; the PPSA; Rule 62-212.400(6), F.A.C., BACT Determination, dated June 15, 1979. The limestone handling and storage system particulate matter

Comments: The Permitting Authority will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Permitting Authority at the above address, email or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices (<http://flhraqs.dep.state.fl.us/oww/>) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station 835, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.50(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of written notice, whichever occurs first. Under Section 120.50(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; (c) The name and address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the

the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: www.epa.gov/region4/air/permits

10/8/04
04506048

PUBLIC NOTICE

The rail car maintenance facility is regulated under the Power Plant Siting Act.

Also, included in this Permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Permitting Authority: Applications for Permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Permit is required to operate the facility. The Department's Bureau of Air Regulation is the Permitting Authority responsible for making a Permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is: 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above, or may view the DRAFT Permit and file elec-

the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of intent. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

Objections: In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of