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BUREAU OF
AIR REGULATION

September 14, 1998

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

RE: Seminole Electric Cooperative, Inc.
Revised DRAFT Title V Permit No. 1070025-001-AV

Dear Mr. Sheplak:

On behalf of Seminole Electric Cooperative, Inc. (Seminole), attached are comments on the Revised Draft Title V permit for the Seminole Power Plant. Seminole appreciates the Department's cooperation and attention thus far in processing this Title V permit, and looks forward to continuing to process this permit as expeditiously as possible. In this regard, Seminole has requested an Extension of Time until September 30, 1998 to resolve the issues contained herein. If this does not provide sufficient time, Seminole intends to request an additional extension request.

Also, Seminole published the Intent to Issue the Revised Draft Title V permit in the Palatka Daily News on September 4, 1998. We will forward a copy of the proof of publication as soon as we receive it.

After you have reviewed these comments, please contact me at your earliest convenience at (813)963-0994.

Sincerely,

for Robert Manning
Mike Roddy
Environmental Engineer

cc: Mike Opalinski
Clair Fancy, P.E., DEP
Ed Svec, DEP
Tom Davis, P.E., ECT
Robert Manning, HGSS

9/14/98 cc: *scott sheplak*

**SEMINOLE ELECTRIC COOPERATIVE
COMMENTS ON REVISED DRAFT TITLE V PERMIT
SEMINOLE POWER PLANT**

Section I., Facility Information, Subsection B.

1. Seminole included the following activities in its list of exempt/insignificant activities in its Title V application, and therefore certified that they meet the criteria under Rule 62-213.430(6), F.A.C. These activities are also exempt pursuant to Rule 62-210.300(3)(a)20., F.A.C., and Rule 62-210.300(3)(a)21., F.A.C. Accordingly, Seminole requests the deletion of the following two activities listed as Unregulated Emission Units and/or Activities.

~~xxx One or more emergency generators not subject to the Acid Rain Program~~
~~xxx One or more heating units and general purpose internal combustion engines not subject to the Acid Rain Program~~

Section II., Facility-wide Conditions.

1. Condition 8. Seminole appreciates the Department's response to our comments on the initial Draft Title V permit, specifically the Department's acknowledging that the reasonable precautions "will be employed as necessary."

Section III. Subsection A.

1. Condition A.3. For clarification, Seminole requests the following revisions to this condition to ensure that the limitations are applied on a per-unit basis: "The only fuels allowed to be fired in each unit are coal The maximum weight of petroleum coke burned in each unit shall not exceed . . . Also the regulatory citation for this condition should either be deleted or include a specific citation to Rule 62-213.410(1), F.A.C.

2. Conditions A.5. and A.6. Seminole requests the combination of these two Conditions as follows to clarify that the 0.03 lb/MMBtu PM limit applies to all solid and liquid fuels (i.e., coal, coal and petroleum coke blends, No. 2 fuel oil, and on-specification used oil). Compliance provisions are addressed separately in Condition A.24 and therefore need not be repeated in Condition A.5.

Particulate Matter (All Solid and Liquid Fuels). No owner or operator shall cause to be discharged into the atmosphere when combusting solid and/or liquid fuels ~~a coal and petroleum coke blend~~ any gases which contain particulate matter in excess of 13 ng/J (0.03 lb/million Btu) heat input, and one percent of the potential combustion concentration (99 percent reduction) when combusting solid fuels, and 30 percent of the potential combustion concentration (70 percent reduction) when combusting liquid fuels. [40 CFR 60.42a(a) and PSD-FL-018(A)]

3. Condition A.8. Seminole requests the following revision to Condition A.8.(1) to add the NSPS Subpart Da SO₂ 90 percent reduction requirement for coal firing. Condition A.8.(3) emission limits only apply to liquid or gaseous fuel combustion per 40 CFR 60.43a(b) and therefore should be deleted from Condition A.8. which addresses SO₂ emission limits for coal only.

(1) 520 ng/J (1.20 lb/million Btu) heat input and 10 percent of the potential combustion concentration (90 percent reduction), or

4. Condition A.9. Seminole requests the following revision to Condition A.9.(1) adds the NSPS Subpart Da SO₂ 90 percent reduction requirement for liquid fuel combustion:

(1) 340 ng/J (0.80 lb/million Btu) heat input and 10 percent of the potential combustion concentration (90 percent reduction), or

5. Condition A.10. This condition has been superseded by NSPS Subpart Da requirements and therefore is obsolete and should be deleted.

6. Condition A.15 and A.17. Seminole requests the following revisions to clarify the NSPS Subpart Da requirements and combine Conditions A.15 and A.17. Compliance provisions are addressed separately in Condition A.25 and therefore need not be repeated in Condition A.15.

No owner or operator subject to the provisions of 40 CFR 60, Subpart Da shall cause to be discharged into the atmosphere from any affected facility any gases which contain nitrogen oxides in excess of the following emission limits, ~~based on a 30-day rolling average.~~

(1) NO_x emissions limits:

(a) Bituminous coal emission limit for heat input: 260 ng/J (0.60 lb/million Btu) heat input determined on a 30-day rolling average when combusting bituminous coal or bituminous coal and petroleum coke blends;

(b) All other liquid fuels emission limit for heat input: 130 ng/J (0.30 lb/million Btu) heat input determined on a 30-day rolling average when combusting liquid fuels, and

(c) 0.50 lb/MMBtu heat input determined on an annual average basis, when subject to the 40 CFR 76.8 Early Election Program for Group 1, Phase II Boilers or in any year when petroleum coke is burned.

(2) NO_x reduction requirement. Solid fuels: 65 percent reduction of potential combustion concentration; Liquid fuels: 30 percent reduction of potential combustion concentration. [40 CFR 60.44a(a)(1) & (2) and PSD-FL-018(A)]

7. Condition A.19. This Condition should be deleted because it is not included in the PSD Final Determination.

8. Condition A.21 and A.22. These Conditions should be deleted because these units are subject to NSPS or NSPS-derived limits and are therefore only subject to the NSPS excess emission provisions; the state excess emission provisions do not apply. It is not appropriate to subject a unit that must comply with an NSPS or NSPS-derived limit, which was established by taking into account the NSPS excess emission provisions, to a more stringent state developed excess emission provision. Moreover, in DEP's June 12, 1998 response to an FCG comment letter, DEP stated that the excess emissions provisions under Rule 62-210.700, F.A.C. do not apply to NSPS emission limits.

9. Condition A.50. Seminole requests the following amendments to this Condition:
(i) Condition A.50.(a)1. should be deleted. Units 1 and 2 are subject to annual compliance testing for PM. Sampling time for PM testing is specified in Condition A.42.(2)(i). Having two conditions which address the same issue is redundant and potentially confusing.

(ii) Condition A.50.(a)2.a. is not applicable because Units 1 and 2 are not batch, cyclical processes or operations which are normally completed within less than the minimum observation period.

(iii) Condition A.50.(a)2.c. addresses requirements pertinent to FDEP employees or their agents and therefore should not be included in the Title V permit; i.e., the requirements do not apply to Seminole.

(iv) Condition A.50.(b) should be deleted. Units 1 and 2 are subject to annual compliance testing for PM. Sampling volume for PM testing is specified in Condition A.42.(2)(i). Having two conditions which address the same issue is redundant and potentially confusing.

10. Condition A.52. Because Condition A.52(a) is a specific condition that only applies to Units 1 and 2, the requested condition revisions state only the specific requirements for these emission units; i.e., eliminates generic language. The requested revisions to Condition A.52.(a)(4) clarify that annual testing is only required for PM. Because compliance with the remaining regulated pollutants for Units 1 and 2 (i.e., SO₂, NO_x, and visible emissions) are determined continuously using CEMS, performing an annual compliance test for these two pollutants is not necessary. The SO₂ and NO_x CEMS are operated, maintained, and certified pursuant to 40 CFR Part 75 requirements, including an annual Relative Accuracy Test Audit (RATA) using EPA reference methods.

The following provisions apply only to Units 1 and 2, ~~emissions units that are subject to an emissions-limiting standard for which compliance testing is required---~~

(a) General Compliance Testing.

~~2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted--~~

~~annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation; except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.~~

3-1. a A compliance test that demonstrates compliance with the applicable particulate matter and visible emission limiting standards specified in Condition A.5. and Condition A.7. shall be submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t-~~ The most recent annual compliance test may be submitted to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for Units 1 and 2 if the units any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. ~~In the case of a fuel burning emissions unit, b-~~ Burned liquid and/or solid fuel for a total of no more than 400 hours.

4-2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. ~~Visible emissions; if there is an applicable standard; and~~
- b. ~~Particulate Matter. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and~~
- c. ~~Each NESHAP pollutant; if there is an applicable emission standard.~~

5-3. An annual compliance test for particulate matter or visible emissions shall not be required ~~for if a unit the any fuel burning emissions unit that~~, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

9-4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

Section III. Subsection B. Railcar Maintenance Facility

1. Condition B.9. Seminole requests the following revisions because Condition B.9 is a specific condition that only applies to the railcar maintenance emission unit. The requested revisions state only the specific requirements for this emission unit; i.e., eliminates generic language.

The following provisions apply only to the railcar maintenance emission unit. ~~those emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) General Compliance Testing.

~~3.1. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a~~ A compliance test that demonstrates compliance with the applicable visible emission limiting standard specified in Condition B.3, shall be conducted and submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~ The most recent annual compliance test may be submitted to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results if the railcar maintenance emission unit did not operate ~~for any emissions unit that, during the year prior to renewal a: did not operate;~~

~~4.2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test shall be conducted for:--a: visible emissions:--if there is an applicable standard;~~

~~9.3. The owner or operator shall notify--t~~The Department shall be notified, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

2. Condition B.11. Seminole requests the following revisions state the specific VE test reporting requirements applicable to the railcar maintenance emission unit.

~~(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.--~~

~~(b)----The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.~~

The results of each visible emission compliance test shall be filed with the Department in a test report as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8), F.A.C.]

Section III. Subsection D - Limestone and FGD Sludge Handling and Storage System

1. Condition D.10. Seminole requests the following revisions to state the specific VE test reporting requirements applicable to the limestone and FGD sludge handling and storage emission unit:

Test Reports.

~~(a)-----The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.~~

~~(b)-----The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.~~

The results of each visible emission compliance test shall be filed with the Department in a test report as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8), F.A.C.]

Section IV. Acid Rain Part

1. Condition A.4. This Condition applies to all of the Conditions in this Title V Permit, and not just the Acid Rain Conditions, and therefore this Condition should be moved to the facility wide section of this Permit.

2. It is unclear that the early election NO_x requirements will apply after this permit becomes effective. The Conditions which state that the compliance plan applies from 2000 to 2007 is contained in the Phase I part of the permit, which states that it governs the units until December 31, 1999. Perhaps the NO_x requirements should be included in the Phase II part of the permit as well.

Appendix U-1, List of Unregulated Emission Units and/or Activities

1. Transfer deleted activities to Appendix E-1:

~~---One or more emergency generators not subject to the Acid Rain Program---
---One or more heating units and general purpose internal combustion engines not subject to the Acid Rain Program---~~

The listed activities (emergency generators and heating units and general purpose internal combustion engines) were certified in the Title V application to meet the criteria of Rule 62-213.430(6), F.A.C., and are exempt pursuant to Rules 62-210.300(3)(a)20., F.A.C. and Rule 62-210.300(3)(a)21., F.A.C.

APPENDIX E-1, List of Exempt Emission Units and/or Activities

1. Add Items 16. through and 18. as follows:

16. One or more emergency generators which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. One or more heating units and general purpose internal combustion engines which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.

The additional activities listed above were included in the Title V application and are specifically exempt pursuant to Rules 62-210.300(3)(a)20., 21., 24., and 26., F.A.C.

Table 1-1, Summary of Air Pollutant Standards and Terms

1. Page 1 of 4. The heading to the Table under Allowable Emissions should include the parenthetical (per unit). Also, the standard for SO₂, for coal and petcoke blend, should include a footnote to include the formula in Condition A.13. Also, the listed standards for SO₂, for coal and petcoke, should contain a notation that they are for petcoke only and the correct standard for coal for Units 1 and 2 is 1.2 pounds per MMBtu.

Table 2-1, Summary of Compliance Requirements

1. Page 1 of 4. In accordance with the authority for Seminole to utilize either CMS or Method 9 for the compliance method for VE, the testing time frequency should be revised. For SO₂ and NO_x, the annual testing time frequency and one hour minimum compliance test duration notation should also be deleted. Finally, the testing for CO and H₂SO₄ should contain a footnote which states that this testing frequency only applies for 5 years from the initiation of petcoke firing, in accordance with Conditions A.69 and A.70.

Periodic Monitoring

1. For SO₂, NO_x, and opacity, Seminole requests the inclusion of the following sentence in the Statement of Basis for the permit (Seminole requests that this language not be included as a condition in the permit):

"For purposes of periodic monitoring for the pollutants SO₂, NO_x, and opacity, the permittee will utilize continuous emission monitors, which are otherwise required by the Acid Rain program and/or 40 CFR Part 60."

2. For particulate matter, Seminole is researching what degree of monitoring should be considered sufficient, based on historical compliance data. Seminole will forward its proposal regarding particulate matter as soon as our research is completed.