



October 15, 1997

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.
DRAFT Title V Permit No. 1070025-001-AV

Dear Mr. Sheplak:

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 previously obtained agreement from the Department, and filed a Request for an Extension, up to and including October 24, 1997, 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 Extension of Time.

As a general matter, Seminole is very interested in being issued the highest quality permit possible, which should include the drafting of conditions specific to Seminole's emission units which reflect our mutual interpretation of Seminole's applicable requirements. As you will see, Seminole's comments were developed with this goal in mind.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Roddy'.

Mike Roddy
Environmental Engineer

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

10/16/97 cc - Scott Sheplak

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OCT 15 1997

BUREAU OF
AIR REGULATION

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

General Comments

1. Seminole understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next month. Accordingly, Seminole requests that its Title V permit reflect the most up-to-date version of this Appendix.

2. Seminole understands that DEP intends to publish the Notice of Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, Seminole requests that DEP provide a copy of the Notice, as well as proof of publication.

Intent to Issue Title V Air Operation Permit

1. The description in the Intent to Issue, as well as several other parts of the draft permit, incorrectly states that Seminole's Title V application was submitted on June 17, 1996. The correct submittal date is June 14, 1996.

Referenced Attachments Made Part of This Permit

1. The wholesale incorporation of the Appendix for 40 CFR 60 Subpart A is inappropriate and should be deleted. See comments to Conditions A.68 and C.11.

Section I., Facility Information, Subsection B.

1. Because the original listed activities are exempt pursuant to Rule 62-210.300(3)(a)20., F.A.C., and Rule 62-210.300(3)(a)21., F.A.C. Seminole requests the deletion of the two activities listed as Unregulated Emission Units and or Activities and the addition of the following activity. The added activity addresses unregulated activities (described as Emission Unit ID 8 in the Title V permit application) not otherwise covered in the draft Title V permit.

~~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~~
xxx General plant fugitives including plant-wide abrasive blasting, painting, moveable abrasive blast material bin, soil borrow pit, and vehicular travel on unpaved roads.

Section II., Facility-wide Conditions.

1. Condition 1. Seminole requests that the edition date be included for Appendix TV-1.

2. Condition 2. The word "not" was apparently inadvertently added, and should be deleted from, the second line of this Condition. FPC requests that Condition 2. be revised as follows: **"Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.** No person shall ~~not~~ cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. Condition 4. As was indicated in Section II, D.12. of the Title V permit application, the Seminole Power Plant processes do not have any regulated substances above the threshold amounts specified in 40 CFR Part 68, §68.130 and therefore, the facility is not subject to the CAA 112(r) accidental release regulatory program. Condition 4 should be deleted.

4. Condition 7. For clarity, Seminole requests that the first sentence of this Condition be edited as follows: **"The permittee shall ~~not allow no person to store, pump . . .~~**" Also, because this condition is not included in Florida's SIP (based on our research), and to be consistent with other permits issued by DEP, this condition should be marked as "Not Federally Enforceable."

5. Condition 8. Seminole requests the following revision to clarify that unconfined particulate matter control measures are only required on an as-needed basis:

Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include the following on an as-needed basis: chemical or water application to unpaved roads or unpaved yard areas; paving and maintenance of roads, parking areas and plant grounds; landscaping and planting of vegetation; confining abrasive blasting where possible; and other techniques, as necessary. [Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 17, 1996.]

Section III. Subsection A.

1. Seminole requests that the description for these units be revised as follows: "...the maximum heat input to each emissions unit is 7,172 million Btu per hour (based on fuel sampling and analysis). . . ."

2. Under the permitting notes in the description, the date for the BACT determination should be corrected to August 9, 1979, instead of June 15, 1979.

3. Condition A.1. Seminole requests the following revision to this condition: "The maximum operation heat input rate, on a monthly average, is as follows:"

4. Condition A.3. For clarification, Seminole requests the following revisions to this condition: "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.

5. 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)]

6. 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

7. 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

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

9. 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)]

10. Condition A.18. For clarification, Seminole requests the following revision: "Only"on-specification" used oil shall be fired in each this unit."

11. Condition A.19. This Condition should be deleted because there is no regulatory or prior-permit authority for its inclusion.

12. Condition A.20. Condition A.20. is not applicable to NSPS Subpart Da affected sources and should be deleted. The condition requirements and regulatory citation for Condition A.20. is from NSPS Subpart D. Per 40 CFR 60.40(e), any facility covered under Subpart Da is not covered under Subpart D.

13. Condition A.21 and A.22. These Conditions should be deleted because these units are subject to the NSPS excess emission provisions; the state excess emission provisions do not apply. All of the emission limits to which these units are subject are NSPS limits. Accordingly, the NSPS excess emission provisions from 40 CFR 60.8(c), 60.11(c), 60.11(d), 60.46a(c), and 60.46a(d)(1) & (2) should be added in this area of the permit. The regulatory citation for these new Conditions should be the 40 CFR cites, as well as Rule 62-204.800, F.A.C. Note that the provisions from 60.46a(c) and 60.46a(d)(1) & (2) are included in the draft permit Conditions

A.26. and A.27. The language out of A.26. and A.27. therefore, should simply be moved to this area of the permit.

14. Condition A.31. On line 6 of this Condition, the phrase "is experienced" was apparently inadvertently included twice.

15. Condition A.35. Seminole requests the following revision to incorporate the requirements of 40 CFR 60.47a(e); i.e., Condition A.35 does not apply to the COMS required by Condition A.31.

"The continuous monitoring systems required under Conditions A.32., A.33., and A.34 are operated . . ."

16. Condition A.42. Subparagraph 2(ii). The words "transverse" in this subparagraph should be revised to read "traverse." Also, subparagraph 3 of Condition A.42. should be deleted because Seminole uses COM's to determine compliance with the opacity standard.

17. Condition A.46. Seminole requests the deletion of paragraph (c) because each batch of used oil will be analyzed for the constituents listed in Condition A.18. If a batch of used oil is found to contain concentrations of any constituent in excess of those listed in Condition A.18., that batch would not meet the definition of "on-specification" used oil and would not be combusted in Units 1 or 2. However, that analysis should have no bearing on the acceptability of other batches of used oil; i.e., each batch of used oil should be treated separately with respect to being classified as "on-specification" used oil. Also, the regulatory citation supplied by DEP for this Condition appears to be misplaced.

18. 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 or 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.

19. 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.

20. Condition A.53. Because these units are also subject to the Federal Acid Rain Program, Seminole requests the deletion of the existing language for this Condition and the insertion of the following language in its place: "Compliance with the applicable provisions of 40 CFR Part 75 is deemed compliance with 40 CFR 60.49a(a)."

21. Condition A.55. Seminole requests the following revision incorporates the specific language of 40 CFR 60.49a(c).

If the ~~required~~ minimum quantity of emission data as required . . ."

22. Condition A.63. This condition should be deleted because it is redundant with Condition A.54; i.e., both require the submittal of quarterly excess emissions reports, including the reasons for non-compliance.

23. Condition A.65 and A.66. For clarification, Seminole requests the addition of the following sentence to the beginning of these Conditions: "This Condition shall only apply during any calendar year in which on-specification used oil is burned in this unit."

24. Condition A.68. Because it is inappropriate to simply attach an Appendix of provisions out of the NSPS for wholesale incorporation into this permit, Seminole requests the following revision to this Condition: "The Permittee shall comply with the applicable requirements contained in ~~Appendix~~ 40 CFR 60, Subpart A. ~~attached to this permit.~~"

25. Condition A.71. This Condition should be deleted because it is not applicable to NSPS Subpart Da affected sources. The Condition provisions and regulatory citation for Condition A.71. are from NSPS Subpart D. Per 40 CFR 60.40(e), any facility covered under Subpart Da is not covered under Subpart D.

26. Conditions A.72, A.73., A.74, A.75. and A.76. Seminole requests the deletion of these Conditions. Although Seminole was only actually required to conduct ambient monitoring for five years after the issuance of its PSD Permit in 1979, ambient monitoring for PM and SO₂ has been conducted by Seminole for many years. During this time period, measured concentrations of PM and SO₂ have been consistently well below applicable National and State Ambient Air Quality Standards (AAQS). Moreover, DEP also has a monitoring network established in Palatka which is less than two miles from Seminole's monitors. Accordingly, continuation of ambient monitoring does not appear to serve any purpose.

Conditions A.74. and A.76. require Seminole to convert the existing total suspended particulate (TSP) sampler to one that measures either PM₁₀ or PM_{2.5}. Seminole considers this requirement to be unreasonable and without regulatory basis. National and State AAQS are not applicable requirements for permanent emission sources and therefore ambient monitoring is not an appropriate requirement to be included as a Title V permit condition.

Section III. Subsection B. Railcar Maintenance Facility

1. For your convenience, attached to this comment letter is a recently recompiled Conditions of Certification for the Seminole Power Plant.

2. Condition B.1. This Condition should be deleted based on a March 2, 1995 modification to the Conditions of Certification.

3. Condition B.4. Based on the March 2, 1995 to modification of the Conditions of Certification, Seminole requests the following revision to this Condition: "Volatile organic compound emissions shall not exceed ~~37.7~~ 38.75 pounds per hour or ~~7.84~~ 11.84 tons per year."

4. Condition B.5. Condition B.5 should be deleted because it is not applicable to the railcar maintenance emission unit. Emission limiting standards for the railcar maintenance emission unit consists of visible emissions (VE) and volatile organic compounds (VOCs). Compliance with the VE standard is determined using EPA Method 9 and compliance with the VOC standard is determined using a material balance. A determination of compliance with either emission limiting standard is not dependent on the use of instruments or equipment to determine process variables; i.e., the emission limitations are fixed and do not depend on the value of a process variable.

5. Condition B.6. For clarification, the phrase "pursuant to Chapter 62-297, F.A.C." appears to be misplaced and should be deleted from this Condition.

6. Conditions B.8. Seminole requests the following revisions to clarify the specific VE testing requirements applicable to the railcar maintenance emission unit; i.e., EPA Method 9 has been previously specified as the applicable opacity test method and potential PM emissions are less than 100 tpy. Condition B.8.(a)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.

(a) Required Sampling Time.

~~2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:~~
~~c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.~~
[Rule 62-297.310(4)(a)2.c., F.A.C.]

7. 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~~ ~~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.

8. 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 C. Coal Storage Yard

1. Condition C.4. The NSPS excess emission provisions should be inserted, specifically 40 CFR 60.11(c), 60.11(d) and 60.46a(c).

2. Condition C.5. Condition C.5 is not applicable to the coal handling and storage emission unit and should be deleted. Emission limiting standards for the coal handling and storage emission unit consist of visible emissions (VE). Compliance with the VE standard is determined using EPA Method 9. A determination of compliance with the VE emission limiting standard is not dependent on the use of instruments or equipment to determine process variables; i.e., the emission limitation is fixed and does not depend on the value of a process variable.

3. Condition C.6. The phrase "pursuant to Chapter 62-297 F.A.C." is an incorrect reference and should be deleted. Also, the regulatory citation for this condition should be 40 CFR 60.11(b) instead of 60.252(c).

4. Condition C.7. and C.8. Because this unit is only subject to an opacity limit and because Condition C.8(a)2. indicates that "The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur," Condition C.7. should be deleted.

Also, for clarification, Seminole requests the following revisions:

Applicable Test Procedures.

(a) Required Sampling Time.

~~2.Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:~~
~~e. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day to day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.~~

[Rule 62-297.310(4)(a)2.c., F.A.C.]

5. Condition C.9. Seminole requests the following revisions because Condition C.9 is a specific condition that only applies to the coal handling and storage emission unit, the requested condition revisions state only the specific requirements for this emission unit; i.e., eliminates generic language. The individual, representative coal handling and storage emission points requiring an annual VE test are also specified, which include all three bag houses for this unit.

The following provisions apply only to representative coal handling and storage emission points CH-001a or b, CH-002, CH-003, CH-004, CH-009a or b, CH-011, and CH-012a or b. ~~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 C.4. 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~~ 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 coal handling and storage 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.

6. Condition C.11. In accordance with comments described above for Condition A.68., Seminole requests the following revision to this Condition: "The Permittee shall comply with the applicable requirements contained in Appendix 40 CFR 60, Subpart A. ~~attached to this permit."~~

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

1. Condition D.5. is not applicable to the limestone and FGD sludge handling and storage emission unit. Emission limiting standards for the limestone and FGD sludge handling and storage emission unit consist of visible emissions (VE). Compliance with the VE standard is determined using EPA Method 9. A determination of compliance with the VE emission limiting standard is not dependent on the use of instruments or equipment to determine process variables; i.e., the emission limitation is fixed and does not depend on the value of a process variable.

2. Condition D.6. The phrase "pursuant to Chapter 62-297 F.A.C." is an incorrect reference and should be deleted from this Condition.

3. Conditions D.7. and D.8. Because this unit is only subject to an opacity limit and because Condition D.8. contains this sentence "The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur",

Condition D.7. should be deleted. Also for clarification, Seminole requests the following revision. The requested revisions clarify the specific VE testing requirements applicable to the limestone and FGD sludge handling and storage emission unit; i.e., EPA Method 9 has been previously specified as the applicable opacity test method and potential PM emissions are less than 100 tpy. Condition D.8.(a)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.

(a) Required Sampling Time.

~~2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:~~
~~e. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.~~
[Rule 62-297.310(4)(a)2.c., F.A.C.]

4. Condition D.9. Seminole requests the following revisions because Condition D.9 is a specific condition that only applies to the limestone and FGD sludge handling and storage emission unit. The individual, representative limestone and FGD sludge handling and storage emission points requiring an annual VE test are also specified.

The following provisions apply only to representative limestone and FGD sludge handling and storage emission points L-001, L-006, FGD-001 or FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, and FGD-009 or FGD-010, 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 D.4. 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 limestone and FGD sludge handling and storage 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 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.

5. 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.1a. should reference the application that Seminole actually submitted rather than generically reference DEP's form.

2. 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.

3. Conditions A.5. and B.2. These Conditions do not serve any purpose, and therefore should be deleted.

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

Transfer deleted activities to Appendix E-1 and add following activity:

- ~~-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~~
- xxx General plant fugitives including plant-wide abrasive blasting, painting, moveable abrasive blast material bin, soil borrow pit, and vehicular travel on unpaved roads.

The listed activities (emergency generators and heating units and general purpose internal combustion engines are exempt pursuant to Rule 62-210.300(3)(a)20., F.A.C. and Rule 62-210.300(3)(a)21., F.A.C. The added activity addresses unregulated activities (described as Emission Unit ID 8 in the Title V permit application) not otherwise covered in the draft Title V permit.

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

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.
18. Degreasing units using heavier-than-air vapors exclusively, except any unit using or emitting any substance classified as a hazardous air pollutant.

The additional activities listed above are specifically exempt pursuant to Rules 62-210.300(3)(a)20., 21., 24., and 26., F.A.C. and would also be expected to meet the criteria of Rule 62-213.430(6)(b).

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. Under the Allowable Emissions area of this Table, Seminole requests the following corrections to the data indicated: The tpy listing for PM, for coal or oil and coal and petcoke blend, should be 943 rather than 942. The tpy for SO₂ on liquid fuel should be 25,131 instead of 26,130. The pounds per hour for SO₂ on coal and petcoke should be 7,538.3/7,491.8 and the tpy should be 33,018/32,814. The tpy for NO_x for coal and petcoke blend should be 15,707.

2. Page 2 of 4 should be corrected in accordance with the comments above. Specifically, the pounds per hour and the tons per year for VOC should be 38.75 and 11.84, respectively, and the regulatory citation should be the March 2, 1995 modification of the Conditions of Certification rather than March 26, 1991.

Table 2-1, Summary of Compliance Requirements

1. Page 1 of 4. The compliance method for VE should only indicate CMS because EPA Method 9 is not required. Accordingly, the testing time frequency of "annual" and a "one hour" minimum compliance test duration should be deleted. 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.

Appendix H-1, Permit History/ID Number Changes

1. The "issue" and "revised" dates listed on this Appendix only apply to the PPSA Conditions of Certification and therefore a separate heading should be made for the PSD Permit which was issued on September 9, 1979; the amendment to that PSD Permit should also be referenced as February 7, 1997. Also, a revision date for the Conditions of Certification should be added for March 2, 1995.



September 12, 1997

RECEIVED

SEP 17 1997

BUREAU OF
AIR REGULATION

Mr. Ed Svec
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Seminle Power Plant Title V Permit Application

Dear Mr. Svec:

As a follow up to your recent information request, please find enclosed four sets of updates to the Seminole Electric Cooperative Inc.(SECI) Title V permit application. These updates include the following information:

- Signed Authorized Representative Form
- Signed P.E. Certification
- Segment D. Forms for: Coal, Petcoke, No.2 fuel oil, used oil.
- No. 2 fuel oil specification sheet
- No. 2 fuel oil analysis sheet
- Used oil analysis sheet

The enclosed information includes four hardcopy originals and four diskettes containing the electronic version.

Please contact me at (813) 963-0994 if there are any questions regarding the enclosed material.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Mike Roddy'.

Mike Roddy
Environmental Engineer

MR/mdj

9/18/97 cc: Ed Svec

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

Richard Midulla

~~Senior Vice President, Technical Division~~

Executive Vice President & Gen. Mgr.

2. Owner/Authorized Representative or Responsible Official Mailing Address:

Organization/Firm: **Seminole Electric Cooperative, Inc.**

Street Address: **16313 North Dale Mabry Highway**

City: **Tampa** State: **FL** Zip Code: **33618**

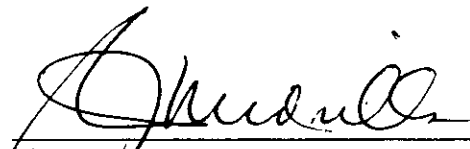
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:

Telephone: **(813) 963-0994**

Fax: **(813) 264-7906**

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*


Signature

9/17/97
Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

| | | | |
|--|--|----------------------------|------------------------|
| 1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777 | | | |
| 2. Professional Engineer Mailing Address: | | | |
| Organization/Firm: | Environmental Consulting & Technology, Inc. | | |
| Street Address: | 3701 NW 98th Street | | |
| City: | Gainesville | State: FL | Zip Code: 32606 |
| 3. Professional Engineer Telephone Numbers: | | | |
| Telephone: (352) 332-0444 | | Fax: (352) 332-6722 | |

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emission units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Thomas R. Owen

Signature

9 | 11 | 97

Date

(seal)

* Attach any exception to certification statement.

Application Contact

| |
|---|
| <p>1. Name and Title of Application Contact :</p> <p style="text-align: center;">Name : Mr. Mike Roddy Title : Environmental Engineer</p> |
| <p>2. Application Contact Mailing Address :</p> <p style="text-align: center;">Organization/Firm : Seminole Electric Cooperative, Inc. Street Address : 16313 North Dale Mabry Highway City : Tampa State : FL Zip Code : 33618-____</p> |
| <p>3. Application Contact Telephone Numbers :</p> <p style="text-align: center;">Telephone : (813)963-0994 Fax : (813)264-7906</p> |

Application Comment

Initial Title V operating permit application for the existing Seminole Electric Cooperative, Inc. Seminole Power Plant.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 1

| | |
|---|---------------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal burned in Unit No. 1 | |
| 2. Source Classification Code (SCC) : 1-01-002-02 | |
| 3. SCC Units : Tons Burned (all solid fuels) | |
| 4. Maximum Hourly Rate : 342.00 | 5. Maximum Annual Rate : 2,991,749.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 4.30 | 8. Maximum Percent Ash : 13.00 |
| 9. Million Btu per SCC Unit : 21 | |
| 10. Segment Comment : Coal-fired unit. Coal sulfur content is a maximum of 4.3 weight %. Data provided in Fields 4, 5, and 9 based on a nominal coal heating value of 10,500 Btu/lb on an as-received basis and maximum heat input of 7,172 MMBtu/hr. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 2

| | |
|---|-----------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : No. 2 fuel oil burned in Unit No. 1 for startups, flame stabilization, and reserve capacity. | |
| 2. Source Classification Code (SCC) : 1-01-005-01 | |
| 3. SCC Units : Thousand Gallons Burned (all liquid fuels) | |
| 4. Maximum Hourly Rate : 3.32 | 5. Maximum Annual Rate : 1,664.20 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 0.50 | 8. Maximum Percent Ash : 0.01 |
| 9. Million Btu per SCC Unit : 136 | |
| 10. Segment Comment : No. 2 fuel oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 3

| | |
|---|---------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : On-spec used oil burned in Unit No. 1 for startups, flame stabilization, and reserve capacity. | |
| 2. Source Classification Code (SCC) : 1-01-005-04 | |
| 3. SCC Units : Thousand Gallons Burned (all liquid fuels) | |
| 4. Maximum Hourly Rate : 3.32 | 5. Maximum Annual Rate : 500.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 0.50 | 8. Maximum Percent Ash : 0.01 |
| 9. Million Btu per SCC Unit : 142 | |
| 10. Segment Comment : On-spec used oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 4

| | |
|---|-------------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Petroleum coke burned in Unit No. 1 | |
| 2. Source Classification Code (SCC) : 1-01-002-02 | |
| 3. SCC Units : Tons Burned (all solid fuels) | |
| 4. Maximum Hourly Rate : 93.00 | 5. Maximum Annual Rate : 814,680.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 7.00 | 8. Maximum Percent Ash : 1.00 |
| 9. Million Btu per SCC Unit : 26 | |
| 10. Segment Comment : Data provided in Fields 4 and 5 based on PSD Permit No. PSD-FL-018(A) modification Item 6. and Conditions of Certification PA 78-10F modification Section 2.f. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 5

| | |
|--|---------------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal and petroleum coke burned in Unit No. 1 | |
| 2. Source Classification Code (SCC) : 1-01-002-02 | |
| 3. SCC Units : Tons Burned (all solid fuels) | |
| 4. Maximum Hourly Rate : 319.00 | 5. Maximum Annual Rate : 2,792,299.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 5.10 | 8. Maximum Percent Ash : 9.40 |
| 9. Million Btu per SCC Unit : 23 | |
| 10. Segment Comment : Data provided in Fields 4, 5, 7, 8, and 9 based on a 70/30 weight percent blend of coal/petroleum coke on an as-received basis. Composite sulfur content in Field 7 is based on 4.3% S for coal and 7.0% S for petroleum coke. Data provided in Fields 4, 5, and 9 based on nominal coal and petroleum coke heating values of 10,500 and 13,000 Btu/lb, respectively, on an as-received basis. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 1

| | |
|---|---------------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal burned in Unit No. 2 | |
| 2. Source Classification Code (SCC) : 1-01-002-02 | |
| 3. SCC Units : Tons Burned (all solid fuels) | |
| 4. Maximum Hourly Rate : 342.00 | 5. Maximum Annual Rate : 2,991,749.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 4.30 | 8. Maximum Percent Ash : 13.00 |
| 9. Million Btu per SCC Unit : 21 | |
| 10. Segment Comment : Coal-fired unit. Coal sulfur content is a maximum of 4.3 weight %. Data provided in Fields 4, 5, and 9 based on a nominal coal heating value of 10,500 Btu/lb on an as-received basis and maximum heat input of 7,172 MMBtu/hr. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 2

| | |
|---|-----------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : No. 2 fuel oil burned in Unit No. 2 for startups, flame stabilization, and reserve capacity. | |
| 2. Source Classification Code (SCC) : 1-01-005-01 | |
| 3. SCC Units : Thousand Gallons Burned (all liquid fuels) | |
| 4. Maximum Hourly Rate : 3.32 | 5. Maximum Annual Rate : 1,664.20 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 0.50 | 8. Maximum Percent Ash : 0.01 |
| 9. Million Btu per SCC Unit : 136 | |
| 10. Segment Comment : No. 2 fuel oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 3

| | |
|---|---------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : On-spec used oil burned in Unit No. 2 for startups, flame stabilization, and reserve capacity. | |
| 2. Source Classification Code (SCC) : 1-01-005-04 | |
| 3. SCC Units : Thousand Gallons Burned (all liquid fuels) | |
| 4. Maximum Hourly Rate : 3.32 | 5. Maximum Annual Rate : 500.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 0.50 | 8. Maximum Percent Ash : 0.01 |
| 9. Million Btu per SCC Unit : 142 | |
| 10. Segment Comment : On-spec used oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 4

| | |
|---|-------------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Petroleum coke burned in Unit No. 2 | |
| 2. Source Classification Code (SCC) : 1-01-002-02 | |
| 3. SCC Units : Tons Burned (all solid fuels) | |
| 4. Maximum Hourly Rate : 93.00 | 5. Maximum Annual Rate : 814,680.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 7.00 | 8. Maximum Percent Ash : 1.00 |
| 9. Million Btu per SCC Unit : 26 | |
| 10. Segment Comment : Data provided in Fields 4 and 5 based on PSD Permit No. PSD-FL-018(A) modification Item 6. and Conditions of Certification PA 78-10F modification Section 2.f. | |

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 5

| | |
|--|---------------------------------------|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal and petroleum coke burned in Unit No. 2 | |
| 2. Source Classification Code (SCC) : 1-01-002-02 | |
| 3. SCC Units : Tons Burned (all solid fuels) | |
| 4. Maximum Hourly Rate : 319.00 | 5. Maximum Annual Rate : 2,792,299.00 |
| 6. Estimated Annual Activity Factor : | |
| 7. Maximum Percent Sulfur : 5.10 | 8. Maximum Percent Ash : 9.40 |
| 9. Million Btu per SCC Unit : 23 | |
| 10. Segment Comment : Data provided in Fields 4, 5, 7, 8, and 9 based on a 70/30 weight percent blend of coal/petroleum coke on an as-received basis. Composite sulfur content in Field 7 is based on 4.3% S for coal and 7.0% S for petroleum coke. Data provided in Fields 4, 5, and 9 based on nominal coal and petroleum coke heating values of 10,500 and 13,000 Btu/lb, respectively, on an as-received basis. | |

**Seminole Power Plant
No. 2 Fuel Oil Description**

No. 2 fuel oil will have the following approximate composition:

| Parameter | Units | Value |
|--------------|----------|--------|
| Carbon | Weight % | 87.0 |
| Hydrogen | Weight % | 12.4 |
| Sulfur | Weight % | 0.5 |
| Nitrogen | Weight % | 0.1 |
| Heat Content | Btu/lb | 19,400 |



#2 / Diesel

Job
FILE NO: J7-04-003
Retain :
Date Rcd: 4/3/97
Date Cmpld: 4/4/97

LAB NO: 6930 / J7-04-03
Client: ASTRA/STUART
For :
Contact:

Rush

OT Apvd. hrs.

Product: HIGH SULFUR DIESEL FUEL Sx Desc.: 3x1qt
Sx ID.: TANK 11 @ ST SA, FL AFTER ANASAZI
ANALYZED BY CALEB BRETT

Sx Comp: EV Vol Wt Avg of

| | | |
|-------------|--|--------|
| D1298 | API Gravity | 34.4 |
| D93 | Flash Point, PMCC, F | 154 |
| D4294 | Total Sulfur, Wt. % | 0.19 |
| D445 | Kinematic Viscosity @ 100F, cSt | 2.68 |
| D445 / D216 | Kinematic Viscosity @ 100F, SSU | 34.4 |
| D482 | Ash, Wt. % | <0.002 |
| D1500 | ASTM Color | 2.0 |
| D1796 | Water & Sediment, Vol. % | 0 |
| D130 | Copper Corrosion, 3 hrs @ 212 F | 1A |
| D611 | Aniline Point, F | |
| D976 | Cetane Index, calculated | 44.2 |
| IP21 | Diesel Index, calculated | |
| D97 | Pour Point, F | -10 |
| D2500 | Cloud Point, F | +6 |
| D613 | Cetane No. | |
| D974 | Neut. No., mgKOH/g | |
| D524 | Carbon Residue, Ramsbottom, Wt. % | |
| D189 | Carbon Residue, (10% Btms) CONRADSON Wt. % | 0.02 |
| D2274 | Oxidation Stability, mg/100ml | |
| Dupont/WPL | Oxidation Stability Pad Rating | 2 |
| L | ASTM Color, after 90 min. | 23.0 |
| D3227 | Mercaptan Sulfur, Wt. % | |
| CPL/WPL | Haze Rating | |
| D86 | Distillation, % Recd/ F | |

| | | | | | | | |
|-----|-----|----|-----|----|-----|--------|------|
| IBP | 363 | 30 | 448 | 70 | 547 | EP | 680 |
| 5 | 387 | 40 | 471 | 80 | 578 | % Rec | 99.0 |
| 10 | 402 | 50 | 496 | 90 | 610 | % Res | 1.0 |
| 20 | 429 | 60 | 520 | 95 | 649 | % Loss | 0 |

| | | |
|--------|--------------------------------|-----|
| D 1319 | OLEFINS, VOL. % | 0.9 |
| D 2276 | PARTICULATE CONTAMINANT - mg/L | 4.4 |

DYE CONTENT 4.0 LBS/1000 GALS
SPTL - 1018 11.3 ppm

Technician:
Approved:
Faxed/Rptd to:
Date: Time:

NORTH USED OIL TANK

MR. MIKE PATRICK
SEMINOLE ELECTRIC COOPERATIVE
P.O. BOX 1577
PALATKA, FL 32178



ANALYTICAL REPORT

Page 1

Submission Number: 9701000203
Date Received: 01/15/97
Date Reported: 01/31/97

Client's P.O. Number:
Project Number:
Project Name: OIL


Lab Sample Number: 9701203 1
Client Sample Number: 96-612
Sample Description: NORTH USED OIL TANK

Date Sampled: 11/12/96
Sample Matrix: Oil

| Method | Analyte | Result | Q | Unit | Reporting Limit | Analyte | Date Analyzed | Date Reported |
|-----------|----------------------------------|--------|---|-------|-----------------|---------|---------------|---------------|
| 3040/7060 | ARSENIC | <0.40 | | mg/kg | 0.40 | JH | 01/30/97 | |
| 3040/7130 | CADMIUM | <1.0 | | mg/kg | 1.0 | JH | 01/29/97 | |
| 3040/7190 | CHROMIUM | <5.0 | | mg/kg | 5.0 | JH | 01/29/97 | |
| 3040/7620 | LEAD | <0.0 | | mg/kg | 5.0 | JH | 01/29/97 | |
| 3040 | DISSOLUTION PROCEDURE FOR METALS | 0.000 | | | | JH | 01/29/97 | |

CERTIFICATION: All analytical data reported above were obtained using the specified methods and were validated by our laboratory quality control system. This laboratory follows an approved quality assurance program.

Respectfully submitted:


Francis Y. Huang, Ph.D. Harry M. Ashby
Lab Director / President

FP 7230°F
Tox 332

P.O. Box 468 • 8 East Tower Circle • Ormond Beach, Florida 32175-0468
(904) 672-5668 • Fax (904) 673-4001

JAN 31 '97 12:14

904 673 4001 PAGE.002

PAGE.008

JUL 15 '97 14:50 FROM SEMINOLE-HQ-2

SOUTH USED OIL TANK

MR. WALT BEAN
SEMINOLE ELECTRIC COOPERATIVE
P.O. BOX 1577
PALATKA, FL 32178



ANALYTICAL REPORT

Page 1

Submission Number: 9702000279
Date Received: 02/14/97
Date Reported: 03/13/97

Client's P.O. Number:
Project Number:
Project Name: SOUTH USED OIL TANK

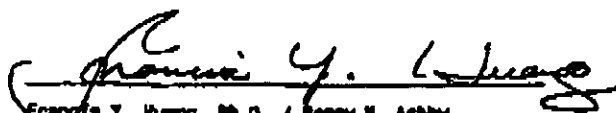
Lab Sample Number: 9702279 1
Client Sample Number: 97-101
Sample Description: SOUTH USED OIL TANK

Date Sampled: 02/14/97
Sample Matrix: OIL

| Method | Analyte | Result | Q | Unit | Reporting Limit | Analyst | Date Analyzed | Date Prepared |
|-----------|----------------------------------|--------|---|-------|-----------------|---------|---------------|---------------|
| 3040/7060 | ARSENIC (Total) | <0.40 | | mg/kg | 0.40 | JB | 02/19/97 | |
| 3040/7130 | CADMIUM (Total) | <1.0 | | mg/kg | 1.0 | AM | 02/21/97 | |
| 3040/7190 | CHROMIUM (Total) | <5.0 | | mg/kg | 5.0 | NR | 03/12/97 | |
| 3040/7190 | LEAD (Total) | <5.0 | | mg/kg | 5.0 | AM | 02/21/97 | |
| 3040 | DISSOLUTION PROCEDURE FOR METALS | 0.000 | | | | AM | 02/21/97 | |

CERTIFICATION: All analytical data reported above were obtained using the specified methods and were validated by our laboratory quality control system. This laboratory follows an approved quality assurance program.

Respectfully submitted:


Francis Y. Huang, Ph.D. / Barry H. Ashby
Lab Director / President

P.O. Box 468 • 8 East Tower Circle • Ormond Beach, Florida 32175-0468
(904) 672-5888 • Fax (904) 673-4001

MAR 13 '97 17:42

904 673 4001 PAGE.007

PAGE.008

JUL 15 '97 14:50 FROM SEMINOLE-HQ-2