



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

April 20, 2009

EPRI Orders and Conferences  
1355 Willow Way, Suite 278  
Concorde, CA 94520

Re: Request for EPRI Emissions Factors Handbook, Correction  
Supporting Documentation for EPRI Hazardous Air Pollutant Emissions Factors  
Seminole Electric Cooperative, Inc., Proposed Unit 3 Project  
Project No. 1070025-011-AC (PSD-FL-375A)

To whom it may concern:

We are working with the Seminole Electric Cooperative, Inc. (SECI) on an application for a new coal-fired boiler at their existing Seminole Generation Station located in Palatka, Florida. For the estimated emissions of several hazardous air pollutants, SECI relied upon emissions factors from the "EPRI Emissions Factors Handbook". As part of the air permit application review, we requested the supporting documentation for these emissions factors. SECI would not provide the requested information to our agency, but indicated that we should contact your office. In a recent meeting, SECI indicated that we should be able to obtain this information from you without charge in the context of an air permit application review for their project. Please contact me if this is not the case.

If these materials are available at no cost, please send "EPRI Emissions Factors Handbook" to my attention at: 2600 Blair Stone Road, MS #5505, Tallahassee, FL 32399-2400. If you have any questions, please contact me at 850-921-9536. In a previous version of this letter, I mistakenly stated that SECI was an EPRI member. This letter corrects that error.

Sincerely,

Jeffery F. Koerner, Administrator, New Source Review Section  
Bureau of Air Regulation (MS #5505)  
Division of Air Resource Management  
Florida Department of Environmental Protection

An electronic copy of this letter was also sent to the following people:

cc: Mr. Mike Roddy, SECI (wmroddy@seminole-electric.com)  
Mr. James R. Frauen, SECI (jfrauen@seminole-electric.com)  
Mr. Scott Osbourn, Golder Associates (sosbourn@golder.com)  
Mr. Robert Manning, Hopping, Green & Sams (rmanning@hgslaw.com)  
Mr. Mike Halpin, DEP Site Certification (mike.halpin@dep.state.fl.us)  
Mr. Chris Kirts, NED (christopher.kirts@dep.state.fl.us)  
Ms. Phyllis Fox, Ph.D. (phyllisfox@gmail.com)  
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)  
Ms. Kristin Henry, Sierra Club (kristin.henry@sierraclub.org)  
Ms. Joanne Spalding, Sierra Club (joanne.spalding@sierraclub.org)  
Ms. Catherine Collins, U.S. Fish and Wildlife Service (catherine\_collins@fws.gov)  
Mr. George Cavros, on behalf of Natural Resources Defense Council and Southern Alliance for Clean Energy  
(gcavros@att.net)  
Ms. Victoria Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Mike Roddy [WMRoddy@seminole-electric.com]  
**Sent:** Monday, April 20, 2009 2:46 PM  
**To:** Livingston, Sylvia  
**Subject:** Re: RAI - Seminole Electric Cooperative, Inc. (1070025-011-AC/PSD-FL-375A)

Document received.

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 4/20/2009 2:20 PM >>>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

## Livingston, Sylvia

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**From:** Ralph Roberson [roberson@rmb-consulting.com]  
**Sent:** Monday, April 20, 2009 3:18 PM  
**To:** Koerner, Jeff  
**Cc:** Livingston, Sylvia  
**Subject:** Correcting the record

Dear Jeff,

I am very disappointed in the letter you wrote EPRI, dated April 20, 2009. While I believe EPRI can provide you with a copy of the Emission Factor Handbook document, you have unnecessarily confused the situation by referring to Seminole as an EPRI member. I could **not** have been clearer in our February 10th meeting. Seminole is an electric cooperative and is not an EPRI member. I suspect your request would be expedited if you were to correct the misstatement in your letter.

Thank you,  
Ralph Roberson, P.E.

## Livingston, Sylvia

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**From:** Robert Manning [RobertM@hgslaw.com]  
**Sent:** Wednesday, April 22, 2009 5:44 PM  
**To:** Livingston, Sylvia  
**Cc:** Gary Perko; Jennifer McNeill  
**Subject:** RE: RAI - Seminole Electric Cooperative, Inc. (1070025-011-AC/ PSD-FL-375A)

Hi Sylvia. Please make a note to send future emails/notices to my partner, Gary Perko, since I am out of the office for 6 months. Thanks, Robert.

Robert Manning  
Hopping Green & Sams, P.A.  
123 South Calhoun Street  
Tallahassee, Florida 32314  
HG&S website: <http://www.hgslaw.com>.  
Reception desk: (850) 222-7500  
Direct line: (850) 425-2263  
Fax: (850) 224-8551  
E-mail: [robertm@hgslaw.com](mailto:robertm@hgslaw.com)

Assistant: Jennifer McNeill  
Jenn's direct line: (850) 425-3464

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Mon 4/20/2009 2:20 PM  
**To:** wmroddy@seminole-electric.com; jfrauen@seminole-electric.com  
**Cc:** sosbourn@golder.com; Robert Manning; Halpin, Mike; Kirts, Christopher; phyllisfox@gmail.com; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; kristin.henry@sierraclub.org; joanne.spalding@sierraclub.org; catherine\_collins@fws.gov; gcavros@att.net; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** RAI - Seminole Electric Cooperative, Inc. (1070025-011-AC/ PSD-FL-375A)

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## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Monday, April 20, 2009 4:46 PM  
**To:** 'wmroddy@seminole-electric.com'; 'jfrauen@seminole-electric.com'  
**Cc:** 'sosbourn@golder.com'; 'rmanning@hgslaw.com'; Halpin, Mike; Kirts, Christopher; 'phyllisfox@gmail.com'; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; 'catherine\_collins@fws.gov'; 'gcavros@att.net'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Request for EPRI Emissions Factors Handbook, Correction  
**Attachments:** EPRI Correspondence.pdf

Dear Sir/Madam:

The attached correspondence replaces the transmittal sent earlier today and corrects two issues. This correspondence was not intended to be transmitted as a request for additional information. There was also a correction made to the attached correspondence that states Seminole Electric Cooperative is not a member of EPRI.

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Mike Roddy [WMRoddy@seminole-electric.com]  
**Sent:** Tuesday, April 21, 2009 11:53 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Request for EPRI Emissions Factors Handbook, Correction

document received. Mike Roddy

>>> "Livingston, Sylvia" <[Sylvia.Livingston@dep.state.fl.us](mailto:Sylvia.Livingston@dep.state.fl.us)> 4/20/2009 4:45 PM >>>

Dear Sir/Madam:

The attached correspondence replaces the transmittal sent earlier today and corrects two issues. This correspondence was not intended to be transmitted as a request for additional information. There was also a correction made to the attached correspondence that states Seminole Electric Cooperative is not a member of EPRI.

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Kristin.Henry@sierraclub.org  
**Sent:** Monday, April 20, 2009 6:56 PM  
**To:** Livingston, Sylvia  
**Subject:** Re: Request for EPRI Emissions Factors Handbook, Correction  
**Attachments:** EPRI Correspondence.pdf

I can view the document.

Kristin Henry  
Staff Attorney  
Sierra Club  
85 Second Street  
San Francisco, CA 94105-3441  
415.977.5716 phone  
415.977.5793 fax  
[kristin.henry@sierraclub.org](mailto:kristin.henry@sierraclub.org)

"Livingston,  
Sylvia"  
<[Sylvia.Livingston@dep.state.fl.us](mailto:Sylvia.Livingston@dep.state.fl.us)>  
>

04/20/2009 01:45  
PM

To  
<[wmroddy@seminole-electric.com](mailto:wmroddy@seminole-electric.com)>,  
<[jfrauen@seminole-electric.com](mailto:jfrauen@seminole-electric.com)>  
cc  
<[sosbourn@golder.com](mailto:sosbourn@golder.com)>,  
<[rmanning@hgslaw.com](mailto:rmanning@hgslaw.com)>, "Halpin,  
Mike"  
<[Mike.Halpin@dep.state.fl.us](mailto:Mike.Halpin@dep.state.fl.us)>,  
"Kirts, Christopher"  
<[Christopher.Kirts@dep.state.fl.us](mailto:Christopher.Kirts@dep.state.fl.us)>  
, <[phyllisfox@gmail.com](mailto:phyllisfox@gmail.com)>,  
<[forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)>,  
<[abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov)>,  
<[kristin.henry@sierraclub.org](mailto:kristin.henry@sierraclub.org)>,  
<[joanne.spalding@sierraclub.org](mailto:joanne.spalding@sierraclub.org)>,  
<[catherine.collins@fws.gov](mailto:catherine.collins@fws.gov)>,  
<[gcavros@att.net](mailto:gcavros@att.net)>, "Gibson,  
Victoria"  
<[Victoria.Gibson@dep.state.fl.us](mailto:Victoria.Gibson@dep.state.fl.us)>,  
"Koerner, Jeff"  
<[Jeff.Koerner@dep.state.fl.us](mailto:Jeff.Koerner@dep.state.fl.us)>,  
"Walker, Elizabeth \ (AIR\)"  
<[Elizabeth.Walker@dep.state.fl.us](mailto:Elizabeth.Walker@dep.state.fl.us)>  
Subject  
Request for EPRI Emissions Factors  
Handbook, Correction

## Livingston, Sylvia

---

**From:** Ralph Roberson [roberson@rmb-consulting.com]  
**Sent:** Tuesday, April 21, 2009 12:57 PM  
**To:** Koerner, Jeff  
**Cc:** Livingston, Sylvia  
**Subject:** Follow-up

Dear Jeff,

Thank you for promptly correcting your letter to EPRI. That correction should eliminate some confusion that I am sure would have ensued otherwise. I will certainly do everything I can to see that your request is honored promptly.

Thanks again,  
Ralph Roberson



## **Livingston, Sylvia**

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**From:** Abrams.Heather@epamail.epa.gov  
**Sent:** Tuesday, April 21, 2009 8:12 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Request for EPRI Emissions Factors Handbook, Correction

Got it - Thanks

Heather Abrams  
Air Permits Section  
U.S. EPA - Region 4  
61 Forsyth St. SW  
Atlanta, Georgia 30303

Phone: 404-562-9185  
Fax: 404-562-9019

## **Livingston, Sylvia**

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**From:** Osbourn, Scott [Scott\_Osbourn@golder.com]  
**To:** Livingston, Sylvia  
**Sent:** Monday, April 20, 2009 5:11 PM  
**Subject:** Read: Request for EPRI Emissions Factors Handbook, Correction

Your message

**To:** Scott\_Osbourn@golder.com  
**Subject:**

was read on 4/20/2009 5:11 PM.