

Air Permitting Discussion

SECI Seminole Generating Station



**Presented to
Florida Department of Environmental Protection**

Presented by:



February 9, 2006



Air Permit Applications

CAIR/Acid Rain Compliance Package

- Units 1 and 2 upgrades

Unit 3 SCA

- Prospective netting analysis for Unit 3 and federally enforceable reductions from Units 1 and 2

Submittal Schedule

1st Application Package

- Units 1 and 2 Upgrades
- CAIR/Acid Rain Compliance Package
- DEP Pre-Application Meeting November 1, 2005
- Application Submittal Week of February 13th, 2006
- Commence Construction by September 2006

CAIR/Acid Rain Issues

- Permit application will address:
 - LNBS
 - SCR
 - FGD Upgrades
 - Alkali Injection
 - CBO
 - Steam Turbine Upgrade

CAIR/Acid Rain Issues

- LNBs

- Meet Acid Rain limit of 0.46 lb/MMBtu (annual average) by January 2008;
- Commence construction by 9/06; and
- No anticipated increase in CO emissions

CAIR/Acid Rain Issues

- SCR
 - Installed for CAIR and Unit 3 netting
 - SCR design will result in SAM emission increase
 - Alkali injection system for SAM control
(considering sodium bisulfite, lime, or ammonia)

SO₂ Issues

- FGD upgrades to modules, trays, mist eliminators, etc.
- Permit limit of 0.67 lb/MMBtu for Units 1 and 2, once upgrades are complete, associated with SO₂ Class I modeling

CBO Unit Issues

- Emission increase in PM, VOC insignificant;
- Emissions for NO_x, SO₂ offset by Units 1 and 2 controls;
- CO emissions subject to PSD; and
 - BACT of 0.15 lb/MMBtu proposed
 - Propose initial RM 10 test for compliance
- Subject to NSPS Db
 - Will demonstrate compliance with 0.20 lb/MMBtu NO_x limit using existing CEMs
 - CBO NO_x limit does not alter facility baseline for Unit 3 netting purposes

Proposed Control Equipment Upgrades and Additions

Proposed Modification	Commence Construction	Commence Operation
Unit 1 LNB	September 2006	October 2006
Unit 2 LNB	March 2007	April 2007
Unit 1 SCR/Alkali Injection	June 2007	December 2008
Unit 2 SCR/Alkali Injection	January 2008	December 2009
Unit 1 FGD Upgrade	January 2007	December 2008
Unit 2 FGD Upgrade	January 2007	December 2008
CBO Process	June 2007	December 2008
Steam Turbine Upgrades Unit 1	January 2007	June 2008
Steam Turbine Upgrades Unit 2	January 2008	June 2009

Unit 3 Application Package

Unit 3 Application Summary

- Unit 3 Netting Out of PSD for NO_x, SO₂ and SAM
- Federally Enforceable Reductions from Units 1 and 2
- No Facility-Wide Increase in Mercury
- Separate DEP Meeting
- Submit Application in March 2006

Unit 3 Application

- EPA's Comments on Scoping Document
 - Units 1 and 2 reductions creditable for PSD vs CAIR compliance;
 - Resolution of PSD Class I issue;
 - Regional haze modeling; and
 - Mercury control and modeling



Questions??