

Holladay, Cleve

From: Halpin, Mike
Sent: Tuesday, April 11, 2006 3:15 PM
To: Koerner, Jeff
Cc: Vielhauer, Trina; Holladay, Cleve
Subject: RE: Seminole Electric

A point of clarification before I answer that question – even though a PSD review is NOT triggered for Units 1 and 2, a PSD review IS required on Unit 3 for PM/PM10, CO, VOC and FI. Netting will apply for NOx, SO2, SAM and Hg. My current thinking is that this permit would specify the emission decreases needed for Units 1 and 2, both before and after Unit 3 begins operation.

Mike

From: Koerner, Jeff
Sent: Tuesday, April 11, 2006 3:05 PM
To: Halpin, Mike
Cc: Vielhauer, Trina; Holladay, Cleve
Subject: RE: Seminole Electric

Mike,

Will this permit specify the actual, enforceable emissions decreases needed for Unit 3 to avoid PSD review for everything except CO emissions?

Jeff

From: Halpin, Mike
Sent: Tuesday, April 11, 2006 2:55 PM
To: Koerner, Jeff; Holladay, Cleve
Cc: Vielhauer, Trina
Subject: RE: Seminole Electric

Jeff –

An update on Seminole (SECI) Units 1 and 2 pollution control upgrades...

The application was submitted indicating that a PSD review was triggered for CO alone. I sent a Request For Additional Information with most of the questions surrounding the submitted baseline emission data. Today I had a conference call with SECI – they had dug digging deeper (to answer my questions about CO), and the plant made them aware they have had CO monitors installed since ~2001! A review and analysis of that continuous emission data supports a change to the submitted baseline CO emissions (which had been based upon annualized stack tests).

As a result of the change, a PSD Review for CO is not triggered now.

They are sending me a formal communication on all of this, but it makes the permit review and issuance much simpler.

BTW – Barring a request by the applicant to make even further CO reductions on Units 1 and 2, the new baseline emission data does NOT change the fact that a PSD review for CO is still triggered on Unit 3.

I hope to have a draft permit for you in the next 2 weeks or so.

Cleve –

Have you begun your write-up on the TEPD yet?

Mike

From: Koerner, Jeff
Sent: Thursday, April 06, 2006 10:11 AM
To: Vielhauer, Trina
Cc: Halpin, Mike
Subject: FW: Seminole Electric

Jeff

From: Vielhauer, Trina
Sent: Thursday, April 06, 2006 9:47 AM
To: Halpin, Mike; Koerner, Jeff
Subject: RE: Seminole Electric

How does this sound:

Thanks for your email, below.

I've spoken with Mike and Jeff about this issue. The language in the Title V permit related to opacity is federal NSPS language. So, anything we aren't really able to change the federal requirements. {Wording?} I think there are some things we could do to further investigate the 7 hours of 99% opacity even with the NSPS language.

1. I would look into whether or not the facility was operating in a manner consistent with good air pollution control practices to minimize emissions. Was the scrubber on during these 7 hours? Was the facility following its start-up plan? Is a start-up normally 7 hours? Why was this start-up different than the others? The condition allows/requires us to look at: information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
2. If the scrubber was not on-line or not operating properly, it would also be circumvention.
3. Are there are any operation and maintenance concerns that may have led to these levels of opacity?
4. There are PM emission limits in this permit also. Do we have reason to believe the facility was in violation of its PM standards during this 7 hour period? {PM limits probably do not apply during startup - non steady state.} The compliance method is a compliance test. We could require a special compliance test to show they are compliance with PM limits at 99% opacity. {I advise against this ...}
5. [Question for Mike/Jeff: I was looking for a CAM plan to see if they could allege they didn't follow the CAM plan but it doesn't seem to have one. There isn't a statement in the SOB about CAM. They do have some CEMS for compliance, but they have a PM limit and opacity CEMS is not the compliance method so it seems there should have been/should be a CAM...?] {May they don't have their renewal permit yet?}

The permit we have in-house right now is only triggering PSD for CO. We don't have a good avenue to add an additional opacity requirement through this permitting action since it isn't triggering PSD for PM. I'd look into the items, above, and bring them to the table to emphasize this won't be tolerated in the future.

From: Kirts, Christopher
Sent: Tuesday, March 28, 2006 11:29 AM
To: Oven, Hamilton; Holtom, Jonathan; Mitchell, Bruce
Cc: Strong, Greg; Halpin, Mike; Banks, Richard
Subject: Seminole Electric

Greetings,

I understand the siting plan for Seminole Electric (1070025) is presently being drafted. In that case it I would like to provide you with a situation that occurred last week that resulted in a citizen complaint.

During a routine startup, SE experienced opacity of 99% for seven hours. Searching their permit (003-AV) it appears that this is not a violation unless we can prove that they did not "to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control for minimizing emissions." Practicably speaking, this is nearly unenforceable.

We really need to have language in the permit that limits duration of startup and excess opacity limits.

It is really hard to explain to the public that SE belched black smoke on them for 7 hours and we allow that.

Thanks,

Rick Banks

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