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BUREAU OF
AIR REGULATION

May 10, 2010

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

**Re: Seminole Electric Cooperative, Inc.
Seminole Generating Station – Facility ID No. 1070025
Title V Air Operation Permit No. 1070025-013-AV
Request for Title V Air Operation Permit Revision**

Dear Ms. Vielhauer:

Project No. : 1070025-015-AV

Seminole Electric Cooperative, Inc. (SECI) recently received a renewed Title V Air Operation Permit for the Seminole Generating Station (SGS) located in Palatka, Putnam County, Florida. This permit (Permit No. 1070025-013-AV) was issued on December 23, 2009 with an effective date of January 1, 2010 and expiration date of December 31, 2014.

The renewed Title V air operation permit contains conditions pertaining to the planned SGS Unit 3. Since SECI decided to discontinue the construction and operation of Unit 3, and formally relinquished the Unit 3 PSD air construction permit, revision of the Title V permit conditions relevant to Unit 3 is requested. In conjunction with the Unit 3 project, upgrades to the existing emission control systems to SGS Units 1 and 2 were authorized by Department Air Construction Permit No. 1070025-004-AC issued on June 21, 2006. This air construction permit contains conditions and language that supported the permitting of Unit 3 that are no longer applicable. Accordingly, SECI also requests revisions to Air Construction Permit No. 1070025-004-AC. The specific revisions to Title V Air Operation Permit No. 1070025-013-AV and Air Construction Permit No. 1070025-004-AC are provided on Attachment 1.

The administrative and signature pages of the Department's *Application for Air Permit – Long Form* (DEP Form No. 62-210.900(1), Effective 3/11/2010) are also attached (Attachment 2).

Please contact me at (813) 739-1224, or by email at wmroddy@seminole-electric.com if you have any questions or need any additional information..

Sincerely,

Mike Roddy
Manager of Environmental Affairs

Attachments

SEMINOLE ELECTRIC COOPERATIVE, INC.
SEMINOLE GENERATING STATION

ATTACHMENT 1

REQUESTED REVISIONS TO TITLE V AIR OPERATION PERMIT NO. 1070025-013-AV
AND AIR CONSTRUCTION PERMIT NO. 1070025-004-AC

A. Title V Air Operation Permit No. 1070025-013-AV

1. Condition A.5.

A.5 CO Emissions – PSD Avoidance. To demonstrate that the project authorized by Permit No. 1070025-004-AC did not result in a significant increase in CO emissions, for a period of five years (2009 through 2014) the carbon monoxide (CO) emissions from both units combined shall not exceed 12,565 tons per 12-month rolling total as determined by data collected from the required CEMS. The existing CO emission monitors which are installed in the stack shall be certified according to 40 CFR Part 60 and the data collected shall be combined and utilized to demonstrate compliance annually. [PSD Avoidance and Permit No. 1070025-004-AC].

2. Condition A.6.

Deletion of Condition A.6. is requested because the upgrades to Units 1 and 2 did not trigger any requirements applicable to mercury emissions.

3. Condition A.10.

A.10 NO_x Emissions – PSD Avoidance.

- a. The combined NO_x emissions from Units 1 and 2 shall not exceed 0.07 lb/MMBtu based on a 12-month rolling average. Compliance shall be determined by data collected from the certified CEMS.
- b. The combined NO_x emission rate shall be computed by adding the total pounds emitted for both Units 1 and 2 divided by the total heat input (MMBtu) for both Units 1 and 2 for each 12-month rolling period.

~~[PSD Avoidance and Permit No. 1070025-012-AC]~~

4. Condition A.16.

A.16. SO₂ Emissions – PSD Avoidance.

- a. ~~Once the upgrades authorized by Permit No. 1070025-004-AC are complete, SO₂ emissions shall not exceed 0.67 lb/MMBtu (combined for Units 1 and 2) based upon a 24 hour block average as determined by CEMS.~~
- b. ~~As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), SO₂ emissions shall not exceed 0.38 lb/MMBtu (combined for Units 1 and 2), based upon a 24-hour block average as determined by CEMS.~~

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- c. The combined SO₂ emission rate shall be computed by adding the total pounds emitted for both Units 1 and 2, divided by the total heat input (MMBtu) for both Units 1 and 2 for each 24-hour block period.
[PSD Avoidance and Permit No. 1070025-004-AC]
5. Condition A.17.
- A.17. Sulfuric Acid Mist (SAM) – PSD Avoidance**
The permittee shall maintain and submit to the Department information for a period of five years (2009 through 2014) demonstrating that the project authorized by Permit No. 1070025-0004-AC did not result in a significant emissions increase of SAM. The information shall be based on annual tests conducted in accordance with Method 8 or 8A.
- ~~**A.17. Sulfuric Acid Mist (SAM) – PSD Avoidance.**~~
- ~~a. Once the upgrades authorized by Permit No. 1070025-004-AC are complete, SAM emissions shall not exceed 0.096 lb/MMBtu (combined for Units 1 and 2) based upon an initial stack test (only) conducted in accordance with EPA Method 8 or 8A.~~
- ~~b. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), SAM emissions shall not exceed 0.031 lb/MMBtu (combined for Units 1 and 2) based on an annual stack test conducted in accordance with EPA Method 8 or 8A.~~
- ~~c. The combined emission rate shall be computed by measuring the lb/MMBtu emission rate on each unit, multiplying each unit's maximum emission rate by its annual heat input (MMBtu), adding the total pounds emitted for both Units 1 and 2, and dividing by the total heat input (MMBtu) for both Units 1 and 2.~~
[PSD Avoidance and Permit No. 1070025-004-AC]
6. Condition A.23.
- Deletion of Condition A.23. is requested.
7. Condition A.29.
- Delete row in table related to "Determination of Mercury Emissions."
8. Condition A.30.
- A.30. Continuous Compliance.** The permittee shall demonstrate continuous compliance with the applicable emissions standards by collecting data with the required CEMS for

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the following pollutants: CO, ~~mercury (when operational and certified)~~, NO_x, and SO₂. The permittee shall demonstrate continuous compliance with the applicable opacity standard by collecting data with the required COMS. [Rules 62-4.070(3), 62-212.400 and 62-297.520, F.A.C.; and NSPS Subparts A and Da in 40 CFR 60]

9. Condition A.31.

Deletion of Condition A.31. is requested because these tests have been completed.

10. Condition A.33.

A.33. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each unit shall be tested to demonstrate compliance with the emissions standards for ammonia slip and ~~mercury (until CEMS are operational and certified)~~, particulate matter and sulfuric acid mist. [Rule 62-297.310(7), F.A.C. and Permit No. Permit No. 1070025-004-AC]

11. Condition A.34.

Deletion of Condition A.34. is requested because annual testing for ammonia slip and particulate matter are required by Condition A.33.

12. Condition A.40.

Deletion of Condition A.40. is requested because these requirements have been completed.

B. Air Construction Permit No. 1070025--AC

1. Section 3A, Condition 7

7. Sulfur Dioxide (SO₂):

- a. ~~The interim~~ Sulfur Dioxide emissions from Units 1 and 2 shall not exceed 0.67 lb/MMBtu (combined for Units 1 and 2), based upon a 24 hour block average via CEMS.
- b. ~~The permanent limits shall be 0.38 lb/MMBtu (combined for Units 1 and 2), based upon a 24 hour block average via CEMS.~~

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- c. The combined emission rate shall be computed by adding the total lbs emitted for both Units 1 and 2, divided by the total MMBtu heat input for both Units 1 and 2 for each 24-hour block period.
[PSD Avoidance]
2. Section 3A, Condition 8.
8. Nitrogen Oxides (NO_x):
 - a. ~~Once all upgrades are complete or by January 1, 2010, whichever is earlier, the combined~~ The combined Nitrogen Oxide emissions from Units 1 and 2 shall not exceed 0.07 lb/MMBtu, based upon a 12-month rolling average. Compliance shall be determined by data collected from the certified continuous emissions monitor (CEM).
 - b. The combined emission rate shall be computed by adding the total lbs emitted for both Units 1 and 2 divided by the total MMBtu heat input for both Units 1 and 2 for each 12-month rolling period.
 - c. ~~When operating the CBO fluidized bed combustor, the affected Steam Electric Generating Unit shall not exceed 0.20 lb/MMBtu NO emissions based on a 30-day rolling average via CEMS.~~
[40 CFR Parts 72 and 76; NSPS Subpart Db and PSD Avoidance; and Permit No. 1070025-012-AC]
3. Section 3A, Condition 9.
9. Carbon Monoxide (CO)/Volatile Organic Compounds (VOC): To demonstrate that this project did not result in a significant increase in CO emissions, for a period of five years (2009 through 2014) ~~the~~ emissions of Carbon Monoxide from both Units 1 and combined shall not exceed 12,565 TPY based upon a 12-month rolling total. The ~~existing CO emission monitors which are installed in the stack shall be certified~~ according to 40 CFR Part 60 and the data collected shall be combined and utilized to demonstrate compliance annually. Also, initial performance test data shall be submitted to demonstrate compliance with the burner CO guarantee of 0.20 lb/MMBtu. For VOC, an initial stack test (only) shall be required in order to demonstrate that the emissions do not exceed the established baseline emission rate of 0.06 lb/ton of coal. Testing shall be according to EPA Method 18, 25, 25A or 25B.
[PSD Avoidance]

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4. Section 3A, Condition 10.

10. Sulfuric Acid Mist (SAM):

The permittee shall maintain and submit to the Department information for a period of five years (2009 through 2014) demonstrating that the project authorized by this permit did not result in a significant emissions increase of SAM. The information shall be based on annual tests conducted in accordance with Method 8 or 8A.

~~a. The interim Sulfuric Acid Mist emissions from Units 1 and 2 shall not exceed 0.096 lb/MMBtu, based upon an initial stack test (only) via EPA Method 8 or 8A.~~

~~b. The permanent limits shall be 0.031 lb/MMBtu (combined for Units 1 and 2), based upon annual stack test via EPA Method 8 or 8A.~~

~~c. The combined emission rate shall be computed measuring the lb/MMBtu emission rate on each unit, multiplying each unit's maximum emission rate by its annual heat input (MMBtu), adding the total lbs emitted for both Units 1 and 2, and dividing by the total MMBtu heat input for both Units 1 and 2.
[PSD Avoidance]~~

5. Section 3A, Condition 12.

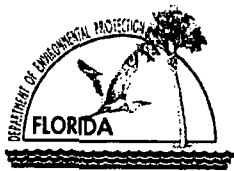
Deletion of Section 3A, Condition 12. is requested.

6. Section 3A, Condition 16.

Deletion of Section 3A, Condition 16. is requested.

7. Section 3B (CBO System)

Deletion of Section 3B is requested.



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Seminole Electric Cooperative, Inc.	
2. Site Name: Seminole Generating Station	
3. Facility Identification Number: 01070025	
4. Facility Location...: Street Address or Other Locator: 890 North U.S. Highway 17 City: 7 Miles North of Palatka County: Putnam Zip Code: 32177-8647	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Mike Roddy, Manager of Environmental Affairs		
2. Application Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427		
3. Application Contact Telephone Numbers... Telephone: (813) 963-0994 ext. 1224 Fax: (813) 264-7906		
4. Application Contact Email Address: wmroddy@seminole-electric.com		

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 5-13-10	3. PSD Number (if applicable):
2. Project Number(s): 1010025-015-AV	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- ☐ Air construction permit.
- ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- ☐ Initial Title V air operation permit.
- ☐ Title V air operation permit revision.
- ☐ Title V air operation permit renewal.
- ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- ☒ Air construction permit and Title V permit revision, incorporating the proposed project.
- ☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- ☒ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

APPLICATION INFORMATION

Application Comment

Seminole Electric Cooperative, Inc. (SECI) recently received a renewed Title V Air Operation Permit for the Seminole Generating Station (SGS) located in Palatka, Putnam County, Florida.

The renewed Title V air operation permit contains conditions pertaining to the planned SGS Unit 3. Since SECI decided to discontinue the construction and operation of Unit 3, and formally relinquished the Unit 3 PSD air construction permit, revision of the Title V permit conditions relevant to Unit 3 is requested.

In conjunction with the Unit 3 project, upgrades to the existing emission control systems to SGS Units 1 and 2 were authorized by Department Air Construction Permit No. 1070025-004-AC issued on June 21, 2006 and Air Construction Permit No. 1070025-012-AC issued on March 6, 2009. These air construction permits contain conditions and language that supported the permitting of Unit 3 that are no longer applicable. Accordingly, SECI also requests revisions to these air construction permits.

The specific revisions to Title V Air Operation Permit No. 1070025-013-AV, Air Construction Permit No. 1070025-004-AC, and Air Construction Permit No. 1070025-012-AC are provided on Attachment 1.

Scope of Application

Application Processing Fee

DEP Form No. 62-210.900(1) – Form
Effective: 3/11/2010

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.


NOT APPLICABLE

1. Owner/Authorized Representative Name:
2. Owner/Authorized Representative Mailing Address Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers Telephone: ext. Fax:
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature _____ Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Michael P. Opalinski, Sr. Vice President of Strategic Services
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427
4. Application Responsible Official Telephone Numbers... Telephone: (813) 963-0994 ext.1233 Fax: (813) 264-790
5. Application Responsible Official E-mail Address: mopalinski@seminole-electric.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>5/10/2010</u>

APPLICATION INFORMATION

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 Northwest 98th Street**

City: **Gainesville**

State: **Florida**

Zip Code: **32606-5004**

3. Professional Engineer Telephone Numbers...

Telephone: **(352) 332 - 0444** ext. Fax: **(352) 332 - 6722**

4. Professional Engineer Email Address: **tdavis@ectinc.com**

5. 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.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐ 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 emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐ if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal 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.

Signature

Date

5/6/10

*No other exceptions to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 438.8 North (km) 3,289.2		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Brenda Atkins, Director of Plant Operations			
2. Facility Contact Mailing Address... Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 890 North Highway 17 City: Palatka State: FL Zip Code: 32177-8647			
3. Facility Contact Telephone Numbers: Telephone: (386) 328-9255 ext. Fax: (386) 328-5571			
4. Facility Contact Email Address: batkins@seminole-electric.com			

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:			
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:			
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -			
4. Facility Primary Responsible Official E-mail Address:			

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	