

# Florida Department of Environmental Protection

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## Memorandum

To: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeffery Koerner, New Source Review Section  
From: Bruce Mitchell, New Source Review Section  
Date: January 29, 2010  
Subject: Project No. 1070025-014-AC  
Minor Air Construction Permit  
Seminole Electric Cooperative, Inc., Seminole Generating Station  
Unit 2 Steam Turbine Efficiency Upgrades

Attached for your review is a draft minor air construction permit package for the existing Seminole Generating Station, which is located in Putnam County at 890 North U.S. Highway 17 in Palatka, Florida. Briefly, the draft permit authorizes upgrades to steam turbine Unit 2 for increased unit efficiency in order to recover portions of the lost electrical output powering the new and upgraded control systems authorized by air construction project 1070025-004-AC, issued June 21, 2006, and expired December 31, 2009. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is not considered a new source review reform project. Day 90 of the permitting time clock is April 27, 2010. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/rbm

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
Tampa, Florida 33618

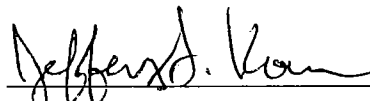
Draft Permit No. 1070025-014-AC  
Seminole Electric Cooperative, Inc.  
Seminole Generating Station  
Unit 2 Steam Turbine Upgrade  
Putnam County, Florida

### PROJECT DESCRIPTION

Seminole Electric Cooperative, Inc. operates the existing Seminole Generating Station, which is located in Putnam County at 890 North U.S. Highway 17 in Palatka, Florida. The applicant proposes to upgrade the steam turbine for existing Unit 2 to increase the unit efficiency and recover portions of the lost electrical output to power the recently installed and upgraded control systems. The upgraded steam turbine will generate additional electricity through the improved use of steam. The maximum steam production and steam characteristics (e.g., pressure and temperature) will not change. There will be no increase in the maximum heat input rate, fuel flow rate or steam production rate. There will be no increase in emissions. The proposed project will not change the applicability of any existing state or federal requirements.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

***I HEREBY CERTIFY*** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.  
Registration Number 49441

02-02-10

(Date)



# 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

February 2, 2010

Mr. Michael Opalinski, Sr. Vice President of Strategic Services  
Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
Tampa, Florida 33618

Re: Project No. 1070025-014-AC  
Seminole Electric Cooperative, Inc., Seminole Generating Station  
Unit 2 Steam Turbine Efficiency Upgrades

Dear Mr. Opalinski:

On January 27, 2010, you submitted an application requesting re-authorization to upgrade steam turbine Unit 2 for increased unit efficiency in order to recover portions of the lost electrical output to power the new and upgraded control systems authorized by air construction Permit No. 1070025-004-AC. The existing facility is located in Putnam County at 890 North U. S. Highway 17 in Palatka, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Bruce Mitchell, at 850/413-9198

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/rbm

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## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
Tampa, Florida 33618

Project No. 1070025-014-AC  
Minor Air Construction Permit

*Authorized Representative:*  
Mr. Michael Opalinski  
Sr. Vice President of Strategic Services

Seminole Generating Station  
Unit 2 Steam Turbine Efficiency Upgrades  
Putnam County, Florida

**Facility Location:** Seminole Electric Cooperative, Inc. operates the existing Seminole Generating Station, which is located in Putnam County at 890 North U.S. Highway 17 in Palatka, Florida.

**Project:** The applicant proposes to upgrade steam turbine Unit 2 for increased unit efficiency in order to recover portions of the lost electrical output used to power the new and upgraded control systems. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

## **WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 2/2/10 to the persons listed below.

Mr. Michael Opalinski, Seminole Electric Cooperative Inc. (SECI) (mopalinski@seminole-electric.com)  
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. Jim Alves, Hopping, Green & Sams (jalves@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. Heather Abrams, EPA Region 4 (abrams.heather@epamail.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)  
Mr. Preston Robertson, Florida Wildlife Federation (preston@fwfonline.org)  
Ms. Victoria Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILED AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
(Clerk)

2/2/10  
(Date)

## **PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft Air Construction Permit  
Project No. 1070025-014-AC  
Seminole Electric Cooperative, Inc., Seminole Generating Station  
Putnam County, Florida

**Applicant:** The applicant for this project is Seminole Electric Cooperative, Inc. The applicant's authorized representative and mailing address is: Mr. Michael Opalinski, Senior Vice President of Strategic Services, Seminole Electric Cooperative, Inc., Seminole Generating Station, 16313 North Dale Mabry Highway, Tampa, Florida 33618.

**Facility Location:** Seminole Electric Cooperative, Inc. operates the existing Seminole Generating Station, which is located in Putnam County at 890 North U.S. Highway 17 in Palatka, Florida.

**Project:** The applicant proposes to upgrade the steam turbine for existing Unit 2 to increase the unit efficiency and recover portions of the lost electrical output to power the recently installed and upgraded control systems. The upgraded steam turbine will generate additional electricity through the improved use of steam. The maximum steam production and steam characteristics (e.g., pressure and temperature) will not change. There will be no increase in the maximum heat input rate, fuel flow rate or steam production rate. There will be no increase in emissions. The proposed project will not change the applicability of any existing state or federal requirements.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:  
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the

**(Public Notice to be Published in the Newspaper)**

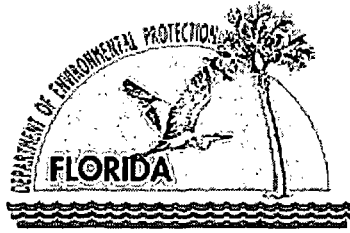
Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C. A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.





**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

**PROJECT**

Project No. 1070025-014-AC  
Seminole Generating Station  
Facility ID No. 1070025  
Unit 2 Steam Turbine Efficiency Upgrade Project

**COUNTY**

Putnam County, Florida

**APPLICANT**

Seminole Electric Cooperative, Inc.  
Seminole Generating Station  
890 North U.S. Highway 17  
Palatka, Florida 32177

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation – New Source Review Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, FL 32399-2400

February 1, 2010

**1. GENERAL PROJECT INFORMATION****Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable Chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U.S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

**Facility and Location**

Seminole Generating Station is an electrical generating power plant with a Standard Industrial Classification Code of SIC No. 4911. The facility is located in Putnam County approximately seven miles north of Palatka at 890 North U.S. Highway 17. The UTM coordinates are Zone 17, 438.8 km East, and 3289.2 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

**Facility Regulatory Categories**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

**Project Description**

On January 27, 2010, the Department received a request to re-authorize upgrades to the steam turbine on existing Unit 2 to improve the turbine blade efficiency and increase the gross electrical output by approximately 13.6 megawatts (MW). This increase in electrical output will partially offset the increased parasitic electric load used to power the new and upgraded air pollution emission control systems recently installed on Unit 2 under air construction Permit No. 1070025-004-AC, which was issued on June 21, 2006 and expired December 31, 2009.

The planned upgrades include, but are not limited to, the replacement of the following equipment: L-0 and L-1 low pressure turbine rotating blades; L-0 blade carriers; G-0 and G-1 stationary blades; inner-stage seal strips; and rotor hub covers. Also planned are modifications to the inner casing horizontal joint. The replacement L-0 blades will be slightly longer thereby reducing kinetic energy exhaust losses. The exit area of the replacement L-0 blade carrier will be increased and the replacement L-1 blades will be shrouded to allow for more efficient blade geometry and to reduce blade tip losses. In addition, the inner casing horizontal joint will be modified to reduce the amount of steam that currently bypasses the turbine blades.

The upgraded steam turbine will generate additional electricity through the improved use of steam. The

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

maximum steam production and steam characteristics (e.g., pressure and temperature) will not change. There will be no increase in the maximum heat input rate, fuel flow rate or steam production rate. There will be no increase in emissions. The proposed project will not change the applicability of any existing state or federal requirements.

### 2. PSD APPLICABILITY

#### General PSD Applicability

The Department regulates major stationary sources in accordance with Florida's PSD program pursuant to Rule 62-212.400, F.A.C. A PSD preconstruction review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards or areas designated as "unclassifiable" for a given pollutant. A facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories; or, 5 tons per year or more of lead.

New projects at existing PSD-major stationary sources are reviewed for PSD applicability based on net emissions increases from the project. Each PSD pollutant is evaluated for applicability based on emissions thresholds known as the Significant Emission Rates as defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant". In addition, applicants may choose to conduct a "PSD netting analysis" that includes all emissions increases as well as all emissions decreases for a 5-year period contemporaneous with the project to determine whether or not a PSD significant emissions increase will occur. Although a facility may be "major" for only one PSD pollutant, the project may be "significant" for several PSD pollutants. For each significant PSD pollutant, the applicant must employ the Best Available Control Technology (BACT) to minimize emissions and conduct an air quality analysis that demonstrates emissions from the project will not cause or contribute to adverse ambient impacts.

#### PSD Applicability for the Project

The following table summarizes the actual emissions before and after the project.

Pollutant	Actual Emissions, Tons/Year			Subject to PSD?
	Baseline	Projected	Change	
Carbon Monoxide (CO)	3702	3702	0	No
Nitrogen Oxides (NO <sub>x</sub> )	11,910	1741	-10,170	No
Particulate Matter (PM)	540	540	0	No
PM < 10 Microns	540	540	0	No
Sulfur Dioxide (SO <sub>2</sub> )	13,628	10,729	-2899	No
Volatile Organic Compounds (VOC)	59	59	0	No
Sulfuric Acid Mist (SAM)	822	732	-90	No

The 2-year baseline periods selected for the PSD pollutants are: 2005/2006 (NO<sub>x</sub>, SO<sub>2</sub> and SAM); and 2007/2008 (CO, PM, PM<sub>10</sub> and VOC). For purposes of this project, the applicant did not estimate any demand growth. The predicted emissions decreases are the result of installing and operating new low NO<sub>x</sub> burners and selective catalytic reduction for NO<sub>x</sub> control, a new flue gas desulfurization system for SO<sub>2</sub> control and a new alkali injection system for SAM control. The proposed upgrades to the Unit 2 steam turbine will not have any effect on air pollutant emissions, but will better utilize the steam produced by the Unit 2 boiler. Therefore, the project does not trigger PSD preconstruction review.

### 3. DEPARTMENT REVIEW

#### Current Applicable Requirements

Steam-electric generator Unit 2 (EU0002) is an existing coal fired, dry-bottom wall-fired boiler with a maximum generator rating of 714.6 MW, electric. The maximum heat input is 7172 MMBtu/hour. The boiler is equipped with the following operating control systems: an electrostatic precipitator for the control of particulate matter; a wet limestone flue gas desulfurization system to control sulfur dioxide (SO<sub>2</sub>) emissions; low-NOx burners and low excess-air firing for the control of nitrogen oxides (NOx) emissions; a selective catalytic reduction system to further reduce NOx emissions; and an alkali injection system to further reduce sulfuric acid mist emissions. Unit 2 began commercial operation in 1984.

The operation of Unit 2 is currently subject to the following state regulations:

- Rule 62-212.400(PSD), F.A.C. (Permit No. PSD-FL-018 authorized the installation of Unit 2. Permit No. PSD-FL-372 authorized upgrades and new air pollution controls on Unit 2.)

The operation of Unit 2 is currently subject to the following federal regulations:

- 40 CFR 60, Subparts A and Da, NSPS for Electrical Generating Units for which Construction is Commenced After September 18, 1978.
- 40 CFR 72, et al: Acid Rain, Phase I and Phase II.

The proposed project will not increase the emissions of any pollutant; therefore, the project does not trigger any new applicable state regulations, NSPS provision or NESHAP provisions. Unit 2 remains subject to all applicable conditions in the current Title V air operation permit.

### 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project does not trigger preconstruction new source review under PSD and will remain in compliance with the terms and conditions contained in the current Title V operation permit. The Department intends to issue a draft permit to authorize upgrades to the steam turbine for existing Unit 2. This determination is based on a technical review of the request, reasonable assurances provided by the applicant and the conditions contained in their current Title V operation permit. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit documents. Jeff Koerner, P.E. is the Air Permitting Supervisor responsible for reviewing and editing the proposed documents. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

# DRAFT PERMIT

## PERMITTEE

Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
Tampa, Florida 33618

Air Permit No. 1070025-014-AC  
Permit Expires: March 31, 2012  
Minor Air Construction Permit

### *Authorized Representative:*

Mr. Michael Opalinski  
Senior Vice President of Strategic Services

Seminole Generating Station  
Unit 2 Steam Turbine Upgrade

## PROJECT

This is the final air construction permit, which authorizes steam turbine upgrades to Unit 2 to improve steam turbine blade efficiency and gross electrical output by approximately 13.6 megawatts (MW). The proposed work will be conducted at the existing Seminole Generating Station, which is an electrical generating facility categorized under Standard Industrial Classification No. 4911. The existing facility is located in Putnam County at 890 North U. S. Highway 17 in Palatka, Florida. The UTM coordinates are Zone 17, 438.8 km East and 3289.2 km North.

This final permit is organized into the following sections: Section 1 (General Information), Section 2 (Administrative Requirements), Section 3 (Emissions Unit Specific Conditions) and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

(DRAFT)

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

\_\_\_\_\_  
Effective Date

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**DRAFT PERMIT**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on \_\_\_\_\_ (DRAFT) \_\_\_\_\_ to the persons listed below.

Mr. Michael Opalinski, Seminole Electric Cooperative Inc. (SECI) (mopalinski@seminole-electric.com)  
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. Jim Alves, Hopping, Green & Sams (jalves@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. Heather Abrams, EPA Region 4 (abrams.heather@epamail.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)  
Mr. Preston Robertson, Florida Wildlife Federation (preston@fwfonline.org)  
Ms. Victoria Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date,  
pursuant to Section 120.52(7), Florida Statutes, with the  
designated agency clerk, receipt of which is hereby  
acknowledged.

(DRAFT)

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

## SECTION 1. GENERAL INFORMATION (DRAFT)

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### FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 1070025	
ID No.	Emission Unit Description
<i>Regulated Emissions Units</i>	
001	Steam Electric Generator No. 1
002	Steam Electric Generator No. 2
004	Coal Storage Yard
005	Limestone and FGD Sludge Handling and Storage
<i>Unregulated Emissions Units</i>	
006	Emergency Generators
007	Heating Units and General Purpose Internal Combustion Engines
008	General Plant-wide Fugitive Emissions

### PROJECT DESCRIPTION

The purpose of this project is to authorize steam turbine upgrades to existing Unit 2 to improve steam turbine blade efficiency and increase the gross electrical output by approximately 13.6 MW. This increase in electrical output will partially offset the increased parasitic electric load used to power the new and upgraded emission control systems recently installed on Unit 2 under air construction Permit No. 1070025-004-AC, issued June 21, 2006, and expired December 31, 2009. The proposed project will not increase emissions and will not change the applicability of any existing state or federal requirements.

This project will modify the following emissions unit.

Facility ID No. 1070025	
ID No.	Emission Unit Description
002	Steam Electric Generator No. 2

### REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

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## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: All documents related to applications for permits to construct, operate or modify emissions unit shall be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection (Department), at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be submitted to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northeast District Office. The mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida, 32256-7590. The phone number is 904/807-3300.
3. Appendices: The following appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms) and Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. Construction and Expiration: The Department may extend the expiration date upon a satisfactory showing that an extension is justified. Such a request shall be submitted to the Department's Bureau of Air Regulation at least 60 days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, 62-210.300(1) and 62-212.400(12), F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. This permit authorizes construction of the referenced facilities. [Chapters 62-210 and 62-212, F.A.C.]
8. Title V Air Operation Permit: After completing the authorized steam turbine upgrades on Unit 2, the permittee shall update the Unit 2 description as necessary during the next re-opening of the Title V air operation permit for some other cause. [Rule 62-4.070(3) and 62-213.420, F.A.C.]



### SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

#### Unit 2 (EU-002)

The specific conditions of this subsection apply to the following emission unit after the authorized work is completed.

EU ID	Emission Unit Description
002	Steam Electric Generator No. 2

#### CONSTRUCTION ACTIVITIES

1. Steam Turbine Equipment Upgrades: The permittee is authorized to upgrade the steam turbine for Unit 2 to increase the unit efficiency and recover portions of the lost electrical output to power the new and upgraded air pollution control systems. The planned upgrades include, but are not limited to, the replacement of the following equipment: L-0 and L-1 low pressure turbine rotating blades; L-0 blade carriers; G-0 and G-1 stationary blades; inner-stage seal strips; and rotor hub covers. Also planned are modifications to the inner casing horizontal joint. The replacement L-0 blades will be slightly longer thereby reducing kinetic energy exhaust losses. The exit area of the replacement L-0 blade carrier will be increased and the replacement L-1 blades will be shrouded to allow for more efficient blade geometry and to reduce blade tip losses. In addition, the inner casing horizontal joint will be modified to reduce the amount of steam that currently bypasses the turbine blades. The project is expected to increase the steam turbine performance by approximately 13.6 MW of additional gross electrical output through the improved use of steam. The maximum steam production and steam characteristics (e.g., pressure and temperature) will not change. There will be no increase in the maximum heat input rate, fuel flow rate or steam production rate. There will be no increase in emissions. The proposed project will not change the applicability of any existing state or federal requirements. [Application No. 1070025-014-AC]
2. Notification: Within 10 days of completing the authorized work and restarting Unit 2, the permittee shall notify the Compliance Authority that the project has been completed and Unit 2 is back on line. [Rule 62-4.070(3), F.A.C.]

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## **SECTION 4. APPENDICES**

### **CONTENTS**

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Appendix A. Citation Formats and Glossary of Common Terms

Appendix GC. General Conditions

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## SECTION 4. APPENDIX A

### CITATION FORMATS

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*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

#### REFERENCES TO PREVIOUS PERMITTING ACTIONS

##### Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

##### New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a Title V Major Source Air Operation Permit

##### PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project number

#### RULE CITATION FORMATS

##### Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

##### Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

#### GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

BACT: best available control technology

Be: Beryllium

Btu: British thermal units

CAM: compliance assurance monitoring

Cd: Cadmium

CEMS: continuous emissions monitoring system

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**SECTION 4. APPENDIX A**  
**CITATION FORMATS**

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<b>cfm:</b> cubic feet per minute	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CFR:</b> Code of Federal Regulations	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>COMS:</b> continuous opacity monitoring system	<b>O&amp;M:</b> operation and maintenance
<b>DEP:</b> Department of Environmental Protection	<b>O<sub>2</sub>:</b> oxygen
<b>Department:</b> Department of Environmental Protection	<b>Pb:</b> lead
<b>dscfm:</b> dry standard cubic feet per minute	<b>PM:</b> particulate matter
<b>EPA:</b> Environmental Protection Agency	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>ppmvd:</b> parts per million by volume dry
<b>EU:</b> emissions unit	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.D.:</b> forced draft	<b>PTE:</b> potential to emit
<b>F.S.:</b> Florida Statutes	<b>RACT:</b> reasonably available control technology
<b>FGR:</b> flue gas recirculation	<b>RATA:</b> relative accuracy test audit
<b>F:</b> fluoride	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SCR:</b> selective catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPH:</b> tons per hour
<b>ID:</b> identification	<b>TPY:</b> tons per year
<b>kPa:</b> kilopascals	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>lb:</b> pound	<b>VE:</b> visible emissions
<b>MACT:</b> maximum achievable control technology	<b>VOC:</b> volatile organic compounds
<b>MMBtu:</b> million British thermal units	
<b>MSDS:</b> material safety data sheets	
<b>MW:</b> megawatt	

**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 624.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence

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**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (Not Applicable);
  - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
  - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (1) The date, exact place, and time of sampling or measurements;
    - (2) The person responsible for performing the sampling or measurements;
    - (3) The dates analyses were performed;
    - (4) The person responsible for performing the analyses;
    - (5) The analytical techniques or methods used; and
    - (6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Tuesday, February 02, 2010 5:09 PM  
**To:** 'mopalinski@seminole-electric.com'  
**Cc:** 'wmroddy@seminole-electric.com'; 'jfrauen@seminole-electric.com'; 'sosbourn@golder.com'; 'rmanning@hgslaw.com'; 'jalves@hgslaw.com'; Halpin, Mike; Kirts, Christopher; 'phyllisfox@gmail.com'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; 'catherine\_collins@fws.gov'; 'gcavros@att.net'; 'preston@fwfonline.org'; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** Seminole Electric Cooperative, Inc. - SEMINOLE GENERATING STATION; 1070025-014-AC  
**Attachments:** 1070025-004-AC\_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070025.014.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.014.AC.D_pdf.zip)

**Owner/Company Name:** SEMINOLE ELECTRIC COOPERATIVE, INC.

**Facility Name:** SEMINOLE GENERATING STATION

**Project Number:** 1070025-014-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION

**Facility County:** PUTNAM

**Processor:** Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at

<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

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

---

**From:** Mike Opalinski [MOpalinski@seminole-electric.com]  
**Sent:** Wednesday, February 03, 2010 10:11 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Seminole Electric Cooperative, Inc. - SEMINOLE GENERATING STATION;1070025-014-AC

This is to verify that I received and was able to open the referenced permit project documents.

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 2/2/2010 5:08 PM >>>

Dear Sir/ Madam:

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070025.014.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.014.AC.D_pdf.zip)

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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

---

**From:** Mike Roddy [WMRoddy@seminole-electric.com]  
**Sent:** Wednesday, February 03, 2010 9:53 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Seminole Electric Cooperative, Inc. - SEMINOLE GENERATING STATION;1070025-014-AC

Sylvia: Document received. Also, would you please remove Jim Frauen from your copy list as he is no longer in Environmental Affairs. Thanks, Mike

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 2/2/2010 5:08 PM >>>

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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:** Wednesday, February 03, 2010 9:55 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Seminole Electric Cooperative, Inc. - SEMINOLE GENERATING STATION;1070025-014-AC

Sylvia: Also, would you please send me the Public Notice in "Word" Format. The newspaper requires that . Thanks, Mike

>>> "Livingston, Sylvia" <[Sylvia.Livingston@dep.state.fl.us](mailto:Sylvia.Livingston@dep.state.fl.us)> 2/2/2010 5:08 PM >>>

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070025.014.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.014.AC.D_pdf.zip)

**Owner/Company Name:** SEMINOLE ELECTRIC COOPERATIVE, INC.

**Facility Name:** SEMINOLE GENERATING STATION

**Project Number:** 1070025-014-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION

**Facility County:** PUTNAM

**Processor:** Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

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## Livingston, Sylvia

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**From:** Jim Frauen [JFrauen@seminole-electric.com]  
**Sent:** Wednesday, February 03, 2010 2:07 PM  
**To:** Livingston, Sylvia  
**Subject:** Re: Seminole Electric Cooperative, Inc. - SEMINOLE GENERATING STATION;1070025-014-AC

Ms Livingston,

I received the documents. Thank you.

Jim Frauen

Jim Frauen  
Director of Transmission Services  
Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
Tampa, FL 33618  
(813) 739-1213 Direct Line  
(813) 690-3641 Cell  
(813) 264-7906 Fax  
[jfrauen@seminole-electric.com](mailto:jfrauen@seminole-electric.com)

>>> "Livingston, Sylvia" <[Sylvia.Livingston@dep.state.fl.us](mailto:Sylvia.Livingston@dep.state.fl.us)> 2/2/2010 5:08 PM >>>

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