



January 12, 2008

Mr. Jeffrey Koerner
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JAN 20 2009

BUREAU OF AIR REGULATION

**Re: Seminole Electric Cooperative, Inc.
Seminole Generating Station
Air Construction Permit 1070025-004-AC
Units 1 and 2 - Nitrogen Oxides Emission Limits**

Dear Mr. Koerner:

Seminole Electric Cooperative, Inc. (SECI) was issued Air Construction Permit No. 1070025-004-AC dated June 21, 2006 to upgrade emission control equipment for Units 1 and 2 located at the existing Seminole Generating Station (SGS) located in Palatka, Putnam County, Florida.

As stated in Section 3.A, Specific Condition No. 4, the selective catalytic reduction (SCR) control systems to be installed on Units 1 and 2 are required to have a nitrogen oxides (NO_x) emission rate of 0.07 lb/MMBtu. Specific Condition No. 8 includes interim and final NO_x emission rates of 0.46 and 0.33 lb/MMBtu, respectively, combined for Units 1 and 2 based on a 12-month rolling average via CEMS.

Consistent with the nitrogen deposition modeling conducted for the SGS, SECI requests that the interim and final NO_x emission limits specified in Section 3.A, Specific Condition No. 8.a. and 8.b. be changed to 0.07 lb/MMBtu combined for Units 1 and 2 based on a 12-month rolling average via CEMS. The following changes to Section 3.A, Specific Condition No. 8 are requested:

From:

8. Nitrogen Oxides (NO_x)

- a. The interim Nitrogen Oxide emissions from Units 1 and 2 shall not exceed 0.46 lb/MMBtu, based upon a 12-month rolling average. Compliance shall be determined by data collected from the certified continuous emissions monitor (CEM).

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- b. The permanent limits shall be 0.33 lb/MMBtu (combined for Units 1 and 2), based upon a 12-month rolling average via CEMS.
 - 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 12-month rolling period.
 - d. When operating the CBO fluidized bed combustor, the affected Steam Electric Generating Unit shall not exceed 0.20 lb/MMBtu NO_x emissions based on a 30-day rolling average via CEMS.
- [40 CFR Parts 72 and 76, NSPS Subpart Db and PSD Avoidance]

To:

8. Nitrogen Oxides (NO_x)

- a. Once all upgrades are complete, or by January 1, 2010, whichever is earlier, nitrogen oxide emissions from Units 1 and 2 (combined) 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_x emissions based on a 30-day rolling average via CEMS.
- [40 CFR Parts 72 and 76, NSPS Subpart Db and PSD Avoidance]

The administrative portion of the Department's *Application for Air Permit – Long Form*, including signature pages, is enclosed. Please contact me at (813) 739-1219 if you have any questions regarding this permit revision request.

Sincerely,



Juan Ramirez
Senior Environmental Engineer

Enclosure



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: 1/20/09	3. PSD Number (if applicable):
2. Project Number(s): 1070025-012-AC	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. (revision)
- ☐ 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) was issued Air Construction Permit No. 1070025-004-AC dated June 21, 2006 to upgrade emission control equipment for Units 1 and 2 located at the existing Seminole Generating Station (SGS) located in Palatka, Putnam County, Florida.

As stated in Section 3.A, Specific Condition No. 4, the selective catalytic reduction (SCR) control systems to be installed on Units 1 and 2 are required to have a design nitrogen oxides (NO_x) emission rate of 0.07 lb/MMBtu. Specific Condition No. 8 includes interim and final NO_x emission rates of 0.46 and 0.33 lb/MMBtu, respectively, combined for Units 1 and 2 based on a 12-month rolling average via CEMS.

Consistent with the nitrogen deposition modeling conducted for the SGS, SECI requests that the interim and final NO_x emission limits specified in Section 3.A, Specific Condition No. 8.a. and 8.b. be changed to 0.07 lb/MMBtu combined for Units 1 and 2 based on a 12-month rolling average via CEMS.

Scope of Application

Application Processing Fee

DEP Form No. 62-210.900(1) – Form
Effective: 3/16/08

APPLICATION INFORMATION

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name: Michael P. Opalinski, Sr. Vice President of Strategic Services
2. Owner/Authorized Representative Mailing Address Organization/Firm: Seminole Electric Cooperative, Inc. Street Address: 16313 North Dale Mabry Highway City: Tampa State: FL Zip Code: 33618-1427
3. Owner/Authorized Representative Telephone Numbers Telephone: (813) 963-0994 ext.1233 Fax: (813) 264-790
4. Owner/Authorized Representative Email Address: mopalinski@seminole-electric.com
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> <div style="display: flex; justify-content: space-between;"><div style="text-align: center;"> Signature</div><div style="text-align: center;"><u>1/12/09</u> Date</div></div>

APPLICATION INFORMATION


Application Responsible Official Certification **NOT APPLICABLE**

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:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input 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 type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: ext. Fax:
5. Application Responsible Official E-mail Address:
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 _____

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>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , 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.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , 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 <input type="checkbox"/> , 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.</i> <i>(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 <input type="checkbox"/> , 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.</i>  Signature (seal) Date <u>11/24/08</u>

Attach any exception 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:	