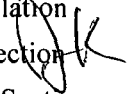


## Memorandum

## Florida Department of Environmental Protection

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To: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeff Koerner, New Source Review Section   
From: Bruce Thomas, New Source Review Section  
Date: March 4, 2009  
Subject: Project No. 1070025-012-AC  
Draft Revision of Air Construction Permit No. 1070025-004-AC  
Seminole Electric Cooperative, Inc., Seminole Generating Station  
Revised Nitrogen Oxides Limits for Unit 1 and 2

Attached for your review is a draft permit package for the Seminole Generating Station, which is located in Putnam County, 7 miles north of Palatka, Florida at 890 North U.S. Highway 17. Seminole Electric Cooperative, Inc. operates the existing coal-fired steam electric generating Units 1 and 2 at the Seminole Generating Station in Palatka. In June of 2006, the Department issued Permit No. 1070025-004-AC to install air pollution control equipment to control NO<sub>x</sub> emissions from Units 1 and 2. The applicant also submitted an application for a water permit, which is being reviewed by the Department's Division of Water Resource Management. That project includes a modeling assessment of the nitrogen deposition with regard to an analysis for the Total Maximum Daily Load (TMDL) and the related Basin Management Action Plan (BMAP) for the Lower St. Johns River. As part of the water permit application process, the applicant has agreed to reduce atmospheric nitrogen deposition by agreeing to lower the air permit limit for the combined NO<sub>x</sub> emissions limit for Units 1 and 2 from 0.33 to 0.07 lb/MMBtu based on a 12-month rolling average. This current air permit project will codify the agreement with the Division of Water Resource Management.

The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/bxt

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

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

Draft Air Permit No. 1070025-012-AC  
Seminole Generating Station  
Putnam County, Florida

### PROJECT DESCRIPTION

This project lowers the combined nitrogen oxides (NO<sub>x</sub>) emissions rate for Units 1 and 2 from 0.33 lb/MMBtu to 0.07 lb/MMBtu to meet the facilities Total Maximum Daily Load (TMDL) obligations and the related Basin Management Action Plan (BMAP) for the Lower St. Johns River.

*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 aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*

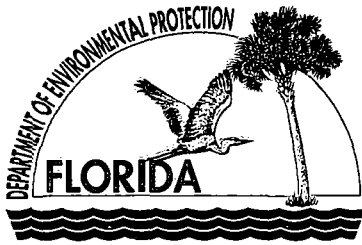


Bruce Thomas, P.E.  
Registration Number: 60278

Date:

3/4/2009





# 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

March 9, 2009

*Sent by Electronic Mail – Received Receipt Requested*

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

Re: Project No. 1070025-012-AC  
Seminole Electric Cooperative, Inc., Seminole Generating Station  
Lower Nitrogen Oxides Emissions Limit for Units 1 and 2

Dear Mr. Opalinski:

On January 20, 2009, you submitted an application requesting a lower combined nitrogen oxides (NO<sub>x</sub>) emissions limit for Units 1 and 2 at the existing Seminole Generating Station from 0.33 to 0.07 pounds per million British thermal unit. The reduced limit will allow the plant to meet its obligations to the Department's Division of Water Resource Management related to a modeling assessment of the nitrogen deposition conducted pursuant to the Total Maximum Daily Load (TMDL) and the Basin Management Action Plan (BMAP) for the Lower St. Johns River. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit Modification; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. 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 Thomas, at 850/488-0114.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/bxt

## 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

*Authorized Representative:*

Mr. Michael Opalinski  
Sr. Vice President of Strategic Services

Project No. 1070025-012-AC  
Revision of Permit No. 1070025-004-AC  
Seminole Generating Station  
Existing Units 1 and 2  
Lower Nitrogen Oxides Emissions Limit  
Putnam County, Florida

**Facility Location:** Seminole Electric Cooperative, Inc. operates the existing Seminole Generating Station, which is located in Putnam County, 7 miles north of Palatka at 890 North U.S. Highway 17.

**Project:** The project will reduce the current combined nitrogen oxides (NO<sub>x</sub>) emissions rate for Units 1 and 2 from 0.33 to 0.07 pounds per million British thermal unit based on a 12-month rolling average. 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**

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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 Revision) 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 3/10/09 to the persons listed below.

Mr. Michael Opalinski, Seminole Electric Cooperative, Inc. ([mopalinski@seminole-electric.com](mailto:mopalinski@seminole-electric.com))

Mr. Mike Roddy, Seminole Electric Cooperative, Inc. ([wmroddy@seminole-electric.com](mailto:wmroddy@seminole-electric.com))

Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. ([jramirez@seminole-electric.com](mailto:jramirez@seminole-electric.com))

Mr. Chris Kirts, NED Office ([kirts\\_c@dep.state.fl.us](mailto:kirts_c@dep.state.fl.us))

Mr. Mike Halpin, DEP Siting Office ([mike.halpin@dep.state.fl.us](mailto:mike.halpin@dep.state.fl.us))

Ms. Kathleen Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

Ms. Heather Abrams, EPA Region 4 ([abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov))

Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto: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.

  
(Clerk)

3/10/09  
(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. 1070025-012-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, Sr. 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, 7 miles north of Palatka at 890 North U.S. Highway 17.

**Project:** Seminole Electric Cooperative, Inc. operates the existing coal-fired steam electric generating Units 1 and 2 at the Seminole Generating Station in Palatka. In June of 2006, the Department issued Permit No. 1070025-004-AC to install air pollution control equipment to control NO<sub>x</sub> emissions from Units 1 and 2. The applicant also submitted an application for a water permit, which is being reviewed by the Department's Division of Water Resource Management. That project includes a modeling assessment of the nitrogen deposition with regard to an analysis for the Total Maximum Daily Load (TMDL) and the related Basin Management Action Plan (BMAP) for the Lower St. Johns River. As part of the water permit application process, the applicant has agreed to reduce atmospheric nitrogen deposition by agreeing to lower the air permit limit for the combined NO<sub>x</sub> emissions limit for Units 1 and 2 from 0.33 to 0.07 pounds per million British thermal unit based on a 12-month rolling average. This current air permit project will implement the agreement with the Division of Water Resource Management. The project is not subject to the preconstruction review requirements of Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

**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: <http://www.dep.state.fl.us/air/eproducts/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.

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

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

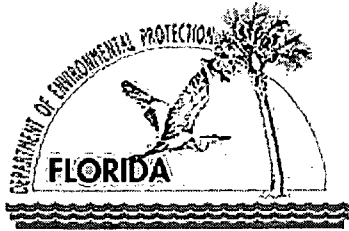
**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's 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  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Seminole Electric Cooperative, Inc  
890 North US Highway 17  
Paltaka, Florida 32177

Seminole Generating Station  
Facility ID No. 1070025

**PROJECT**

Project No. 1070025-012-AC  
(Revises Original Permit No. 1070025-004-AC)  
Application for Minor Source Air Construction Permit  
Reduced Nitrogen Oxides Emissions Limit for Units 1 and 2

**COUNTY**

Putnam County, Florida

**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, Florida 32399-2400

March 9, 2009

## **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 Description 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 3289.2N 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 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 20, 2009, the Department received an application requesting a lower combined nitrogen oxides (NO<sub>x</sub>) emissions limit for Units 1 and 2 from 0.33 lb/MMBtu to 0.07 lb/MMBtu based upon a 12-month rolling average determined by data collected from the certified continuous emissions monitoring system. The lower emissions rate will allow the plant to meet its obligations to the Department's Division of Water Resource Management with regard to the Total Maximum Daily Load (TMDL) and the related Basin Management Action Plan (BMAP) for the Lower St. Johns River.

## **2. PSD APPLICABILITY**

### **General PSD Applicability**

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD

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## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); Fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

### PSD Applicability for Project

The requested project will lower NO<sub>x</sub> emissions limit and is expected to reduce actual NO<sub>x</sub> emissions; therefore the project is not subject to the PSD preconstruction review requirements.

### 3. DEPARTMENT REVIEW

Seminole Electric Cooperative, Inc. operates the existing coal-fired steam electric generating Units 1 and 2 at the Seminole Generating Station in Palatka. In June of 2006, the Department issued Permit No. 1070025-004-AC to install air pollution control equipment to control NO<sub>x</sub> emissions from Units 1 and 2. The applicant also submitted an application for a water permit, which is being reviewed by the Department’s Division of Water Resource Management. That project includes a modeling assessment of the nitrogen deposition with regard to an analysis for the Total Maximum Daily Load (TMDL) and the related Basin Management Action Plan (BMAP) for the Lower St. Johns River. As part of the water permit application process, the applicant has agreed to reduce atmospheric nitrogen deposition by agreeing to lower the air permit limit for the combined NO<sub>x</sub> emissions limit for Units 1 and 2 from 0.33 lb/MMBtu to 0.07 lb/MMBtu based on a 12-month rolling average. This current air

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## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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permit project will implement the agreement with the Division of Water Resource Management.

This permitting action will revise original Permit No. 1070025-004-AC. Deleted text is marked by ~~strike through~~ and new text is marked with double underline. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements. The following note and specific condition 8 in Section 3 of the air construction permit is modified as shown.

### EMISSIONS STANDARDS

*Note: A concurrent application is being processed for a new SGS Unit 3. Where affected, the below emission standards are shown for this project (Pollution Control Upgrades) as "interim" limits. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3, the latter "permanent" emission limits will become effective. This note does not apply to specific condition 8.*

#### 8. Nitrogen Oxides (NO<sub>x</sub>):

- a. Once all upgrades are complete or by January 1, 2010, whichever is earlier, the combined ~~The interim~~ Nitrogen Oxide emissions from Units 1 and 2 shall not exceed 0.46 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 permanent limits shall be 0.33 lb/MMBtu (combined for Units 1 and 2), based upon a 12-month rolling average via CEMS.~~
- eb. The combined emissions rate shall be computed by adding the total pounds 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.
- ec. When operating the CBO fluidized bed combustor, the affected Steam Electric Generating Unit shall not exceed 0.20 lb/MMBtu NO<sub>x</sub> 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]

### 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in an increase in emissions. Bruce Thomas is the project engineer responsible for reviewing the application and drafting the permit. 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

## NOTICE OF PERMIT REVISION

In the Matter of an  
Application for Permit by:

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

Permit No. 1070025-012-AC  
Seminole Generating Station  
Units 1 and 2  
Lower Nitrogen Oxides Emissions Limit  
Putnam County, Florida

*Authorized Representative:*

Mr. Michael Opalinski  
Senior Vice President of Strategic Services

Seminole Electric Cooperative, Inc. operates the Seminole Generating Station, which is an existing coal-fired steam electric generating plant categorized under Standard Industrial Classification Code No. 4911. The existing facility is located in Putnam County, 7 miles north of Palatka at 890 North U.S. Highway 17. This project revises original Permit No. 1070025-004-AC to reduce the combined nitrogen oxides (NO<sub>x</sub>) emissions limit for Units 1 and 2 from 0.33 to 0.07 pounds per million British thermal unit. The lower emissions rate will allow the plant to meet its obligations to the Department's Division of Water Resource Management with regard to the Total Maximum Daily Load (TMDL) and the related Basin Management Action Plan (BMAP) for the Lower St. Johns River. The project is not subject to the preconstruction review requirements of Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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)

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Joseph Kahn, Director  
Division of Air Resource Management

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(Date)

TLV/jfk/bxt

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that either this Notice of Permit Revision package (including the Notice of Air Permit Revision, the Final Determination the Final Permit Revision) 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 \_\_\_\_\_ to the persons listed below.

Mr. Michael Opalinski, Seminole Electric Cooperative, Inc. ([mopalinski@seminole-electric.com](mailto:mopalinski@seminole-electric.com))

Mr. Mike Roddy, Seminole Electric Cooperative, Inc. ([wmroddy@seminole-electric.com](mailto:wmroddy@seminole-electric.com))

Mr. Juan Ramirez, Seminole Electric Cooperative, Inc. ([jramirez@seminole-electric.com](mailto:jramirez@seminole-electric.com))

Mr. Chris Kirts, NED Office ([kirts\\_c@dep.state.fl.us](mailto:kirts_c@dep.state.fl.us))

Mr. Mike Halpin, DEP Siting Office ([mike.halpin@dep.state.fl.us](mailto:mike.halpin@dep.state.fl.us))

Ms. Kathleen Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

Ms. Heather Abrams, EPA Region 4 ([abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov))

Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto: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.

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

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

**This permit action revises original Permit No. 1070025-004-AC.**

The following permit conditions are revised as follows. Deleted text is marked by ~~striketrough~~ and new text is marked with double underline. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements.

The following note and specific condition 8 in Section 3 of the air construction permit is modified as shown.

**EMISSIONS STANDARDS**

*Note: A concurrent application is being processed for a new SGS Unit 3. Where affected, the below emission standards are shown for this project (Pollution Control Upgrades) as "interim" limits. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3, the latter "permanent" emission limits will become effective. This note does not apply to specific condition 8.*

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- a. Once all upgrades are complete or by January 1, 2010, whichever is earlier, the combined ~~The interim~~ Nitrogen Oxide emissions from Units 1 and 2 shall not exceed ~~0.46~~ 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 permanent limits shall be 0.33 lb/MMBtu (combined for Units 1 and 2), based upon a 12-month rolling average via CEMS.~~
- eb. The combined emissions rate shall be computed by adding the total pounds 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.
- dc. When operating the CBO fluidized bed combustor, the affected Steam Electric Generating Unit shall not exceed 0.20 lb/MMBtu NO<sub>x</sub> 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]

## **Livingston, Sylvia**

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**From:** Livingston, Sylvia  
**Sent:** Tuesday, March 10, 2009 5:13 PM  
**To:** 'mopalinski@seminole-electric.com'  
**Cc:** 'wmroddy@seminole-electric.com'; 'jramirez@seminole-electric.com'; Kirts, Christopher; Halpin, Mike; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; Koerner, Jeff; Thomas, Bruce X.; Walker, Elizabeth (AIR)  
**Subject:** Seminole Electric Cooperative, Inc. - SEMINOLE GENERATING STATION; 1070025-012-AC

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/1070025.012.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.012.AC.D_pdf.zip)

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

**Facility Name:** SEMINOLE GENERATING STATION

**Project Number:** 1070025-012-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION

**Facility County:** PUTNAM

**Processor:** Bruce Thomas

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/eproducts/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)

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.



## Livingston, Sylvia

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**From:** Mike Opalinski [MOpalinski@seminole-electric.com]  
**Sent:** Wednesday, March 11, 2009 7:35 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Seminole Electric Cooperative, Inc. - SEMINOLE GENERATINGSTATION;  
1070025-012-AC

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 3/10/2009 5:12 PM >>>

Dear Sir/ Madam:

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070025.012.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.012.AC.D_pdf.zip)

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

**Facility Name:** SEMINOLE GENERATING STATION

**Project Number:** 1070025-012-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION

**Facility County:** PUTNAM

**Processor:** Bruce Thomas

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Permit project documents 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)

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

## Livingston, Sylvia

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**From:** Mike Roddy [WMRoddy@seminole-electric.com]  
**Sent:** Wednesday, March 11, 2009 9:20 AM  
**To:** Livingston, Sylvia  
**Subject:** Re: Seminole Electric Cooperative, Inc. - SEMINOLE GENERATINGSTATION;  
1070025-012-AC

Documents received. Mike Roddy

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 3/10/2009 5:12 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".

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

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Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)