



November 24, 2009

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BUREAU OF AIR REGULATION

Mr. Cleveland G. Holladay
Department of Environmental Protection
2600 Blainstone Road, MS 5505
Tallahassee, Florida 32399-2400

RE: Seminole Electric Cooperative, Inc.
Seminole Generating Station, Title V Renewal
DEP Permit No.: 1070025-013-AV
OGC No. :09-3827

Dear Mr. Holladay:

Seminole Electric Cooperative ("Seminole") offers the following comments regarding the Florida Department of Environmental Protection's issuance of Draft/Proposed Title Air Operation Permit Renewal No. 1070025-013-AV, which is a renewal of Title V Air Operation Permit No, 1070025-002-AV:

1. The Department's decision to change the permit formatting has made the review of specific revisions to this draft/proposed permit very difficult. Seminole understands that the ONLY changes intended by the Department are those described expressly in the Statement of Basis.
2. Condition FW1. – To clarify that there are portions of the Appendices that Seminole is not required to comply with (the entire NSPS for example), Seminole requests the following edits: "The permittee shall comply with the applicable portions of all documents identified in Section VI of the Appendices listed in Table of Contents. . ."
3. Condition FW4. – The heading to this section states that this condition applies "facility-wide to all emissions units and activities." To be consistent with Appendix CR which contains the identical condition, and because some units may be subject to a different VE standard, Condition FW4 should clarify that the general VE standard applies "unless otherwise specified in the permit."

4. A.6. – The reference to test Methods 101A and 108 should be deleted since these methods do not measure mercury emissions, and additional language should be added to allow for “other approved methods.” Also, it would be helpful to clarify that CEMs are not required for these units; rather, Seminole has the option of installing/utilizing them, and if they do, such data may be used for compliance.

Specifically, Seminole requests the following edits: “~~The permanent emissions cap for mercury shall be~~ Mercury emissions shall not exceed 0.059 tons per year (combined for Units 1, 2 *and any future emission units*) based on annual stack tests conducted in accordance with EPA Method 30B, or other approved method, 101A or 108 or by data collected from the CEMS (when operational and certified), if Seminole chooses to install such CEMS. The combined total shall be computed by measuring the lb/MMBtu emission rate on each unit, multiplying each unit’s emission rate by its annual heat input (MMBtu) and adding the total pounds emitted, divided by 2000. [Permit No. 1070025-004-AC].”

5. Condition A.7. – This condition, along with A.9., A.12., A.13., reference NSPS Subpart Db, which is incorrect. These references should be to Subpart Da.
6. Condition A.10. – For clarification and to delete obsolete language, Seminole requests that the first sentence of this condition be edited as follows: “~~Once all upgrades are complete or by~~ Beginning January 1, 2010, ~~whichever is earlier,~~ the combined NOx emissions from Units 1 and 2 shall not exceed 0.07 lb/MMBtu based on a 12-month rolling average. . . .”
7. Condition A.16. – For clarification, Seminole requests the following edits to this Condition:
 - a. ~~The interim~~ Once the upgrades authorized by Permit No. 1070025-004-AC are complete, SO₂ emissions ~~limit for Units 1 and 2~~ shall not exceed 0.67 lb/MMBtu (combined for Units 1 and 2) based upon a 24 hour block average, as determined by CEMS. ~~The “interim emissions limit” is effective once all upgrades are complete.~~
 - b. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), ~~The permanent~~ SO₂ emissions ~~limit shall not exceed be~~ 0.38 lb/MMBtu (combined for Units 1 and 2), based upon a 24-hour block average, as determined by via CEMS. ~~As of the monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), the “permanent emissions limit” is effective.~~

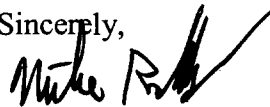
8. Condition A.17. -- For clarification, Seminole requests the following edits:
 - a. ~~The interim~~ Once the upgrades authorized by Permit No. 1070025-004 AC are complete, SAM emissions from Unit 1 and 2 shall not exceed 0.096 lb/MMBtu (combined for Units 1 and 2) based upon an initial stack test (only) conducted in accordance with EPA Method 8 or 8A. The “interim emissions limit” is effective once all upgrades are complete.
 - b. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed),~~The permanent~~ SAM emissions shall not exceed limit is 0.031 lb/MMBtu (combined for Units 1 and 2) based on an annual stack test conducted in accordance with EPA Method 8 or 8A. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), the “permanent emissions limit” is effective.
9. Excess emissions provisions – The draft permit does not include Condition A.20. from permit number 1070025-002-AV, which should be re-inserted.]
10. Condition A.24.b. – The language in this sub-paragraph does not appear in any prior Seminole permit, nor in any of the specific rules cited as authority for this provision. Further, this addition is not referenced in the Statement of Basis as a new requirement. Accordingly, Seminole requests that it be deleted.
11. Conditions A.29. and A.31. – Similar to comment 4 above, the reference to test Methods 101A and 108 should be deleted since these methods do not measure mercury emissions, and additional language should be added to allow for “other approved methods.”
12. Condition A.30., A.33., and A.34. – As stated in comment 4 above, mercury CEMs are not required for these units; rather, Seminole has the option of installing/utilizing them, and if they do, such data may be used for compliance. Seminole requests that these conditions be clarified accordingly.
13. Condition A.40. – For clarification and consistency with Appendix CP, Seminole requests that this condition be edited as follows: “Based on the application, these emissions units have not yet completed~~were not in compliance with~~ some of the applicable requirements of Permit Nos. 1070025-004-AC and 1070025-012-AC at the time the application was submitted. Appendix CP of this permit, Compliance Plan, identifies and includes these remaining applicable requirements, which involve initial tests and notifications~~the applicable compliance schedule.~~ Once these

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requirements in the Compliance Plan are complete, the Compliance Plan will be obsolete."

Thank you for your attention to this matter, and please feel free to contact me at your convenience if you wish to discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Roddy", with a long, sweeping horizontal stroke extending to the right.

Mike Roddy,
Manager of Environmental Affairs

Cc: Robert Manning, HG&S
Juan Ramirez, SECI