



July 21, 2010

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

RECEIVED
JUL 26 2010
BUREAU OF
AIR REGULATION

**Re: Seminole Electric Cooperative, Inc.
Seminole Generating Station
Title V Air Operation Permit No. 1070025-015-AV**

Dear Ms. Vielhauer:

Seminole Electric Cooperative, Inc. (Seminole), offers the following comments regarding the Department's Draft/Proposed Title V Permit Revision No. 1070025-015-AV, dated July 9, 2010. As requested, the Department deleted Condition A.17, but did not delete the corresponding testing requirements in Conditions A.33 and A.34. Accordingly, please delete the sulfuric acid mist testing requirement in Conditions A.33 and A.34. Also, the Department's draft revisions to the construction permit references PSD-FL-372, but this reference apparently should be to 1070025-004-AC; a PSD permit was not issued for the pollution control upgrades for Unit 1 and 2.

Thank you for attention to these comments. If you have any questions or wish to discuss this letter further, please contact me at (813) 963-0994.

Sincerely,

Mike Roddy
Manager of Environmental Affairs

Cc: Jonathan Holtom
Jeff Koerner
Robert Manning, HGS

STATE OF FLORIDA

County of Putnam

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Palatka Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

Florida Department of Enviro

Was published in said newspaper 1 time(s) with said publication being made on the following dates:

07/16/2010

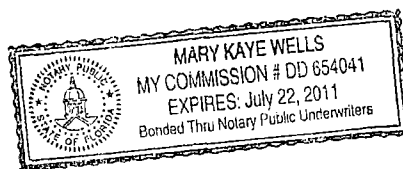
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The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice and/or advertisement.

Vicki Rafuse
Sworn to and subscribed to before me this 16th day of July, 2010 by Vicki Rafuse, Administrative Assistant, of the Palatka Daily News, a Florida corporation, on behalf of the corporation.

Mary Kaye Wells
Mary Kaye Wells, Notary Public
My commission expires July 22, 2011

Notary Seal
Seal of Office:



✓ Personally known to me, or
✓ Produced identification:
✓ Did take an oath

PUBLIC NOTICE

Florida Department of
Environmental Protection
Division of Air Resource
Management, Bureau of Air
Regulation
Draft/Proposed Permit No.
1070025-015-AV
Draft Minor Air Construc-
tion Permit No. 1070025-
016-AC/PSD-FL-372B
Seminole Electric
Cooperative, Inc., Seminole
Generating Station
Putnam County, Florida

Applicant: The applicant
for this project is Seminole
Electric Cooperative, Inc.
The applicant's responsible
official and mailing ad-
dress are: Michael Opalin-
ski, Senior Vice President
of Strategic Services, Semi-
nole Electric Cooperative,
Inc., Post Office Box
272000, Tampa, Florida
33688-2000.

Facility Location: The ap-
plicant operates the exist-
ing Seminole Generating
Station, which is located in
Putnam County at 890
North U.S. Highway 17 in
Palatka, Florida.

Project: The applicant ap-
plied on May 13, 2010 to
the Department for a Title V
air operation permit revi-
sion and minor air con-

struction permit revision.
This is a revision of air
construction permit No.
1070025-004-AC/PSD-FL-
372 and of Title V air opera-
tion permit No. 1070025-
013-AV to remove specific
conditions related to a pro-
posed new unit, which will
not be built. The existing
facility consists of a coal
yard and electric utility
steam generating Units 1
and 2, which are coal-fired,
dry bottom wall-fired boil-
ers with a nominal gross
generator rating of 735.9
megawatts. Each unit is
equipped with the following
air pollution control equip-
ment: an electrostatic pre-
cipitator to control particu-
late matter (PM); an up-
graded wet limestone flue
gas desulfurization system
to control sulfur dioxide
(SO₂); low-NO_x burners,
low excess air firing and a
selective catalytic reduc-
tion system to control ni-
trogen oxides (NO_x); and
an alkali injection system
to control sulfuric acid mist
emissions. Each unit is
equipped with continuous
emissions monitoring sys-
tems to measure and re-
cord NO_x and SO₂ emis-
sions as well as a contin-
uous opacity monitoring
system to measure and re-
cord the opacity of the ex-
haust gas. Each electric
generating unit is subject
to the following primary
regulations: federal New
Source Performance
Standards (NSPS) in Sub-
part Da, Part 60, and Title
40 of the Code of Federal
Regulations; the Depart-
ment's Best Available Con-
trol Technology determina-
tions for NO_x, PM and SO₂
emissions; the federal Acid
Rain Program; and the
Clean Air Interstate Rule.
The coal storage yard, is
subject to the federal NSPS
in Subpart Y, Part 60, and
Title 40 of the Code of Fed-
eral Regulations, which
regulates coal preparation
plants.

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.

Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. 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 the address indicated above for the Permitting Authority. The complete project file includes the draft air construction permit revision, the draft/proposed Title V air operation permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. 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 a minor air construction permit revision 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 draft air construction 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.

The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing 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, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft air construction permit revision 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 this 14-day period. If written comments received result in a significant change to the draft air construction permit revision, the Permitting Authority shall revise the draft air construction permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.) on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

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 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. 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 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 indicate; (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.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 website at <http://www.epa.gov/region4/air/permits/Florida.htm>.