

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jon Holtom, Title V Section *JH*
FROM: Andrew Bass *AB*
DATE: July 8, 2010
SUBJECT: Draft/Proposed Title V Permit No. 1070025-015-AV
Draft Minor Construction Permit No. 1070025-016-AC/PSD-FL-372B
Seminole Electric Cooperative, Inc., Seminole Generating Station
Title V Permit Revision to Remove Conditions Related to SGS Unit 3

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation & Preliminary Determination;
- Draft Minor Construction Permit Revision;
- Title V Statement of Basis;
- Draft/proposed Title V Permit; and,
- P.E. Certifications.

The draft/proposed Title V permit revises the recently renewed Title V permit for the Seminole Generating Station, which is located in Putnam County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance. The P.E. certification briefly summarizes the proposed project.

The application was received and deemed complete on May 13, 2010. Day 90 is August 11, 2010. There is no ongoing/open enforcement case for this facility, according to the Northeast District Office.

The applicant requested a concurrent construction permit revision to reflect the decision to not build Unit 3. The construction permit revision was not necessary due to the provisions of Rule 62-210.300(1)(b), F.A.C., which allow an operation permit to delete obsolete conditions in a construction permit from the list of applicable requirements. The construction permit (project 004-AC) that established interim and permanent limits to make room for Unit 3 without causing a PSD increase expired on December 31, 2009. The construction permit (project 005-AC) that authorized the construction of Unit 3 was surrendered. Following input from the applicant regarding the SAM limit, we agreed to issue a minor construction permit revision to remove the sulfuric acid mist (SAM) limit that was previously established to ensure that the addition of the proposed new unit would not cause a significant increase in SAM emissions.

I recommend your approval of the attached draft/proposed permits.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Permit No. 1070025-016-AC/PSD-FL-372B
Facility ID No. 1070025
Seminole Generating Station
SGS Unit 3 Removal Project
Putnam County, Florida

PROJECT DESCRIPTION

This project is for the revision of permit No. 1070025-004-AC for the above referenced facility. The applicant requested to remove the sulfuric acid mist emissions limit from the permit, as it was established in relation to the proposed SGS Unit 3, which has been abandoned. The revision deletes condition 10 of permit No. 1070025-004-AC, since a potential increase in SAM from the operation of the control devices authorized by that permit is not a concern.

***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).*



Jonathan K. Holtom, P.E.

Registration Number: 0052664



P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Permit No. 1070025-015-AV
Facility ID No. 1070025
Seminole Generating Station
SGS Unit 3 Removal Project
Putnam County, Florida

PROJECT DESCRIPTION

This project is for the revision of Title V permit No. 1070025-013-AV for the above referenced facility. The applicant requested to formally relinquish SGS Unit 3 from the existing Title V permit. The revision includes deleting references to Unit 3 that were authorized by permit No. 1070025-005-AC and the removal of the permanent emissions limits established in permit No. 1070025-004-AC, leaving those limits identified as interim to be the remaining permanent limits.

***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).*

This review was conducted by Andrew Bass, E.I., under my responsible supervision.


Jonathan K. Holtom, P.E.

Registration Number: 0052664

Date

6/24/06



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

Electronic Mail – Received Receipt Requested

Mike Opalinski, Senior Vice President of Strategic Services
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

Re: Title V Permit Revision No. 1070025-015-AV
Minor Air Construction Revision Permit No. 1070025-016-AC/PSD-FL-372B
Seminole Generating Station
Title V Permit Revision to Remove Conditions Related To the Proposed Unit 3

Dear Mr. Opalinski:

Enclosed are the draft construction permit and the draft/proposed Title V permit package to revise the Title V air operation permit for Seminole Generating Station. This facility is located in Putnam County at 890 North U.S. Highway 17, Palatka, Florida. The permit package includes the following documents:

- The draft minor air construction permit revision and supporting technical evaluation and preliminary determination document.
- The Title V Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes to the last Title V renewal.
- The draft/proposed Title V air operation permit revision, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits provides important information regarding: the Permitting Authority's intent to issue an air construction permit revision and a concurrent draft/proposed Title V permit revision for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue the air permits; the procedures for submitting comments on the draft/proposed permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits 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. The Public Notice of Intent to Issue the Air Permits must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication.

If you have any questions, please contact the Project Engineer, Andrew Bass, by telephone at (850) 413-9198 or by email at andrew.bass@dep.state.fl.us.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

7/9/10

Date

Enclosures
TLV/jkh/adB

**WRITTEN NOTICE OF INTENT TO ISSUE MINOR AIR CONSTRUCTION PERMIT REVISION AND
REVISED TITLE V AIR OPERATION PERMIT**

In the Matter of an

Application for Title V Air Operation Permit by:

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

Permit No. 1070025-015-AV
Permit No. 1070025-016-AC/PSD-FL-372B
Facility ID No. 1070025
Seminole Generating Station
Air Construction Permit Revision
Title V Air Operation Permit Revision
Putnam County, Florida

Responsible Official:

Mike Opalinski, Senior Vice President
of Strategic Services

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

Project: The purpose of this project is to issue an air construction permit revision and to revise Title V air operation permit No. 1070025-013-AV to remove specific conditions related to Unit 3. Details of the project are provided in the application and the enclosed Statement of Basis.

The air construction permit revision deletes an obsolete specific condition of permit No. 1070025-004-AC/PSD-FL-372 related to the emissions of sulfuric acid mist.

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.

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 permit 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

WRITTEN NOTICE OF INTENT TO ISSUE MINOR AIR CONSTRUCTION PERMIT REVISION AND REVISED TITLE V AIR OPERATION PERMIT

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.

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 the 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.

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, the Permitting Authority shall revise the draft air construction permit revision 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 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

WRITTEN NOTICE OF INTENT TO ISSUE MINOR AIR CONSTRUCTION PERMIT REVISION AND REVISED TITLE V AIR OPERATION PERMIT

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 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 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.

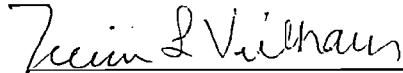
EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently 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

**WRITTEN NOTICE OF INTENT TO ISSUE MINOR AIR CONSTRUCTION PERMIT REVISION AND
REVISED TITLE V AIR OPERATION PERMIT**

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 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

**WRITTEN NOTICE OF INTENT TO ISSUE MINOR AIR CONSTRUCTION PERMIT REVISION AND
REVISED TITLE V AIR OPERATION PERMIT**

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Title V Air Operation Permit Revision (including the Public Notice, the Technical Evaluation and Preliminary Determination, the draft construction permit, the Statement of Basis, and the draft/proposed Title V permit), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 7/12/10 to the persons listed below.

Michael Opalinski, Seminole Electric Cooperative, Inc.: mopalinski@seminole-electric.com

Mike Roddy, Seminole Electric Cooperative, Inc.: wmroddy@seminole-electric.com

Tom Davis, ECT, Inc.: tdavis@ectinc.com

Robert Manning, Hopping, Green & Sams: rmanning@hgslaw.com

Jim Alves, Hopping, Green & Sams: jalves@hgslaw.com

Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov

Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov

Catherine Collins, U.S. Fish and Wildlife Service: catherine_collins@fws.gov

Chris Kirts, DEP-Northeast District: christopher.kirts@dep.state.fl.us

Mike Halpin, DEP Siting Office: mike.halpin@dep.state.fl.us

Monica K. Reimer, Earthjustice: mreimer@earthjustice.org

David Guest, Earthjustice: dguest@earthjustice.org

Alisa Coe, Earthjustice: acoe@earthjustice.org

Preston Robertson, Florida Wildlife Federation: preston@fwfonline.org

Kristin Henry, Sierra Club: kristin.henry@sierraclub.org

Joanne Spalding, Sierra Club: joanne.spalding@sierraclub.org

Gary A. Davis, Gary A. Davis & Associates for Southern Alliance for Clean Energy:

gadavis@enviroattorney.com

Phyllis Fox: phyllisfox@gmail.com

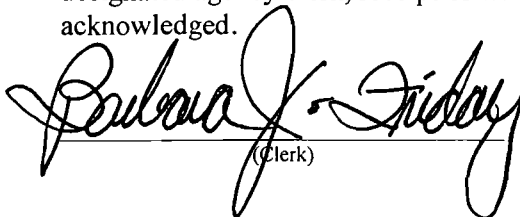
George Cavros: gcavros@att.net

Barbara Friday, DEP BAR: barbara friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

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) 7/12/10 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft/Proposed Permit No. 1070025-015-AV
Draft Minor Air Construction 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 address are: Michael Opalinski, Senior Vice President of Strategic Services, Seminole Electric Cooperative, Inc., Post Office Box 272000, Tampa, Florida 33688-2000.

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

Project: The applicant applied on May 13, 2010 to the Department for a Title V air operation permit revision and minor air construction permit revision. This is a revision of air construction permit No. 1070025-004-AC/PSD-FL-372 and of Title V air operation permit No. 1070025-013-AV to remove specific conditions related to a proposed 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 boilers with a nominal gross generator rating of 735.9 megawatts. Each unit is equipped with the following air pollution control equipment: an electrostatic precipitator to control particulate matter (PM); an upgraded wet limestone flue gas desulfurization system to control sulfur dioxide (SO₂); low-NO_x burners, low excess air firing and a selective catalytic reduction system to control nitrogen oxides (NO_x); and an alkali injection system to control sulfuric acid mist emissions. Each unit is equipped with continuous emissions monitoring systems to measure and record NO_x and SO₂ emissions as well as a continuous opacity monitoring system to measure and record the opacity of the exhaust gas. Each electric generating unit is subject to the following primary regulations: federal New Source Performance Standards (NSPS) in Subpart Da, Part 60, and Title 40 of the Code of Federal Regulations; the Department's Best Available Control Technology determinations 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 Federal 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:

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

<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 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. 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)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

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.

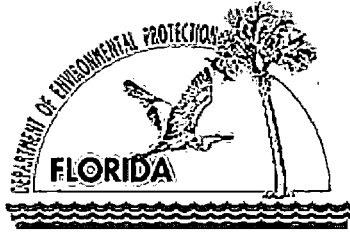
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; 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 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

Seminole Generating Station
Facility ID No. 1070025

PROJECT

Project No. 1070025-016-AC/PSD-FL-372B
Application for Minor Source Air Construction Permit
Removal of Limits Related to Withdrawn Unit 3 Project

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

July 8, 2010

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

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

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

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Seminole Generating Station is an existing coal and petcoke-fired electric generating facility categorized under Standard Industrial Classification No. 4911. The facility is located in Putnam County at 890 North U.S. Highway 17, Palatka, Florida. The UTM coordinates of the facility are Zone 17, 438.8 km East and 3,289.2 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 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

The applicant has requested the removal of the Sulfuric acid mist (SAM) emissions limit that was established in permit No. 1070025-004-AC (PSD-FL-372), which authorized the replacement and upgrades of pollution control devices in order to satisfy the upcoming requirements of the Clean Air Interstate Rule (CAIR). That permit also established certain emissions limits in preparation for the planned addition of a third coal-fired electric utility steam generating unit, in order to avoid any significant pollution increases that would require a Best Available Control Technology review under the PSD program. The applicant has submitted that the SAM limit was only established to avoid PSD for the new unit and that it should be removed since the new unit will not be built.

Processing Schedule

5/13/10 Received the application for a minor source air pollution construction permit; application complete.

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 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_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; 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 SO₂ 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/m³, 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 purpose of this project is simply to remove the sulfuric acid mist (SAM) limit that was established to ensure that the addition of a proposed new unit would not result in a significant increase in SAM emissions above the past actual baseline emissions. There are no changes being authorized to the methods of operation or to any other limits contained within the existing permits. With the withdrawal of the construction permit for the proposed new

unit, the potential increase in SAM emissions above the past baseline no longer exists. The removal of the SAM limit that was established for the new unit will not result in any changes in actual pollutant emissions.

3. DEPARTMENT REVIEW

Permit No. 1070025-004-AC (PSD-FL-372) authorized the replacement of the existing low NO_x burners; the addition of selective catalytic reduction (SCR), an alkali injection system, a carbon burnout (CBO) system; and improvements to the existing flue gas desulfurization (FGD) system and steam turbines. These improvements were selected by the applicant in order to satisfy the upcoming requirements of the Clean Air Interstate Rule (CAIR). That permit also established certain emissions limits in preparation for the planned addition of a third coal-fired electric utility steam generating unit. Emissions limits were established for the new control devices (listed as interim limits) to assure that PSD was not triggered and to address ambient air quality concerns. Lower limits were also established (listed as permanent limits) for further PSD avoidance following the addition of the new unit. The applicant subsequently abandoned the plans to construct the third unit and withdrew the construction permit application. The withdrawal of the Unit 3 application made the permanent emissions limits obsolete, leaving the interim limits as the new permanent limits. The obsolete conditions are being removed through a Title V permit revision, which is being issued concurrently with this construction permit revision. Without the addition of the proposed new unit, the possibility of an increase in SAM emissions from the facility no longer exists. While the addition of SCR on the existing Units 1 and 2 could potentially result in an increase in SAM emissions by itself, this potential was far offset by the significant reduction of SAM emissions following the upgrades that were made to the FGD system. Stack testing following the completion of the upgrades indicates that actual SAM emissions are less than 10% of the actual emissions that were measured prior to the upgrades. It is noted that this testing was conducted while the new alkali-injection system was not in operation. However, the applicant has committed to operate it, further reducing the potential for the formation of SAM emissions. Based on the demonstrated reduction in SAM emissions resulting from the new pollution controls, the Department agrees that the emissions limit that was established for SAM to avoid a PSD increase following the addition of Unit 3 is not needed. The removal of the SAM limit results in a cost savings to the applicant by eliminating the need for unnecessary annual compliance testing and the requirement to pay annual emissions fees related to the regulated emissions of SAM, but does not result in an increase in actual SAM emissions as no changes in the methods of operation are being authorized.

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 a significant increase in emissions. Jon Holtom, P.E., 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 PERMIT REVISION

PERMITTEE

Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688-2000

Authorized Representative:
Mike Opalinski, Senior Vice President of Strategic Services

Air Permit No. 1070025-016-AC/
PSD-FL-372B
Minor Air Construction Permit
Seminole Generating Station
Removal of SAM Limit

PROJECT

This is the final air construction permit, which revises Permit No. 1070025-004-AC (PSD-FL-372) for the following items: removal of Sulfuric Acid Mist (SAM) emissions limit. Seminole Generating Station is an existing coal and petcoke-fired electric generating facility categorized under Standard Industrial Classification No. 4911. The existing facility is located in Putnam County at 890 North U.S. Highway 17, Palatka, Florida. The UTM coordinates are Zone 17, 438.8 km East and 3289.2 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, 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)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit 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 _____ (DRAFT) _____ to the persons listed below.

Michael Opalinski, Seminole Electric Cooperative, Inc.: mopalinski@seminole-electric.com

Mike Roddy, Seminole Electric Cooperative, Inc.: wmroddy@seminole-electric.com

Tom Davis, ECT, Inc.: tdavis@ectinc.com

Robert Manning, Hopping, Green & Sams: rmanning@hgslaw.com

Jim Alves, Hopping, Green & Sams: jalves@hgslaw.com

Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov

Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov

Catherine Collins, U.S. Fish and Wildlife Service: catherine_collins@fws.gov

Chris Kirts, DEP-Northeast District: christopher.kirts@dep.state.fl.us

Mike Halpin, DEP Siting Office: mike.halpin@dep.state.fl.us

Monica K. Reimer, Earthjustice: mreimer@earthjustice.org

David Guest, Earthjustice: dguest@earthjustice.org

Alisa Coe, Earthjustice: acoe@earthjustice.org

Preston Robertson, Florida Wildlife Federation: preston@fwfonline.org

Kristin Henry, Sierra Club: kristin.henry@sierraclub.org

Joanne Spalding, Sierra Club: joanne.spalding@sierraclub.org

Gary A. Davis, Gary A. Davis & Associates for Southern Alliance for Clean Energy:
gadavis@enviroattorney.com

Phyllis Fox: phyllisfox@gmail.com

George Cavros: gcavros@att.net

Barbara Friday, DEP BAR: barbara friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Clerk Stamp

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

(DRAFT)

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

The existing facility consists of a coal yard and electric utility steam generating Units 1 and 2, which are coal and petcoke-fired, dry bottom wall-fired boilers with a nominal gross generator rating of 735.9 megawatts. Each unit is equipped with the following air pollution control equipment: an electrostatic precipitator to control particulate matter (PM); an upgraded wet limestone flue gas desulfurization system to control sulfur dioxide (SO₂); low-NO_x burners, low excess air firing and a selective catalytic reduction system to control nitrogen oxides (NO_x); and an alkali injection system to control sulfuric acid mist emissions. Each unit is equipped with continuous emissions monitoring systems to measure and record NO_x and SO₂ emissions as well as a continuous opacity monitoring system to measure and record the opacity of the exhaust gas.

FACILITY REGULATORY CLASSIFICATION

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

PROPOSED PROJECT

Permit No. 1070025-004-AC (PSD-FL-372) authorized the replacement of the existing low NO_x burners; the addition of selective catalytic reduction (SCR), an alkali injection system, a carbon burnout (CBO) system; and improvements to the existing flue gas desulfurization (FGD) system and steam turbines. These improvements were selected by the applicant in order to satisfy the upcoming requirements of the Clean Air Interstate Rule (CAIR). That permit also established certain emissions limits in preparation for the planned addition of a third coal-fired electric utility steam generating unit. Emissions limits were established for the new control devices (listed as interim limits) to assure that PSD was not triggered and to address ambient air quality concerns. Lower limits were also established (listed as permanent limits) for further PSD avoidance following the addition of the new unit. The applicant subsequently abandoned the plans to construct the third unit and withdrew the construction permit application. The withdrawal of the Unit 3 application made the permanent emissions limits obsolete, leaving the interim limits as the new permanent limits. The obsolete conditions are being removed through a Title V permit revision, which is being issued concurrently with this construction permit revision. Without the addition of the proposed new unit, the possibility of an increase in SAM emissions from the facility no longer exists. While the addition of SCR on the existing Units 1 and 2 could potentially result in an increase in SAM emissions by itself, this potential was far offset by the significant reduction of SAM emissions following the upgrades that were made to the FGD system. Stack testing following the completion of the upgrades indicates that actual SAM emissions are less than 10% of the actual emissions that were measured prior to the upgrades. It is noted that this testing was conducted while the new alkali-injection system was not in operation. However, the applicant has committed to operate it, further reducing the potential for the formation of SAM emissions. Based on the demonstrated reduction in SAM emissions resulting from the new pollution controls, the Department agrees that the emissions limit that was established for SAM to avoid a PSD increase following the addition of Unit 3 is not needed. The removal of the SAM limit does not result in an increase in actual SAM emissions, as no changes in the methods of operation are being authorized.

STATEMENT OF BASIS

Title V Air Operation Permit Revision Permit No. 1070025-015-AV

APPLICANT

The applicant for this project is Seminole Electric Cooperative, Inc. (SECI). The applicant's responsible official and mailing address are: Michael Opalinski, Senior Vice President of Strategic Services, Seminole Electric Cooperative, Inc., Seminole Generating Station, P.O. Box 272000, Tampa, Florida 33688-2000.

FACILITY DESCRIPTION

The applicant operates the existing Seminole Generating Station, which is located in Putnam County, east of U.S. Highway 17 and approximately seven miles north of Palatka. The existing power plant consists of the following emissions units.

- Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002) are coal-fired, dry-bottom wall-fired utility boilers. Each unit has a maximum heat input rate of 7172 million British thermal units (MMBtu) per hour and a nominal gross generator rating of 735.9 megawatts. Each unit is equipped with the following air pollution control equipment: an electrostatic precipitator (ESP) to control particulate matter (PM); an upgraded wet limestone flue gas desulfurization (FGD) system to control sulfur dioxide (SO₂); low-NO_x burners, low excess air firing and a selective catalytic reduction (SCR) system to control nitrogen oxides (NO_x); and an alkali injection system to control sulfuric acid mist emissions. Each unit is equipped with continuous emissions monitoring systems (CEMS) to measure and record NO_x and SO₂ emissions as well as a continuous opacity monitoring system (COMS) to measure and record the opacity of the exhaust gas.
- Other regulated activities include the coal storage yard (EU-004) and the handling and storage of limestone and wet scrubber sludge (EU-005).
- In addition to other miscellaneous unregulated/insignificant emissions units and/or activities, the facility also includes the following unregulated activities: one or more emergency generators (EU-006); one or more heating units and general purpose internal combustion engines (EU-007); and general plant fugitive emissions (EU-008) such as plant-wide sandblasting, painting, moveable abrasive blast material bin, soil borrow pit and vehicular travel of unpaved roads.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit (permit No. 1070025-013-AV) for the above referenced facility. Construction permit No. 1070025-005-AC authorized the addition of SGS Unit 3 into the existing facility. The recently renewed Title V air operation permit contains conditions related to the planned SGS Unit 3 being integrated into the facility. Subsequent to the issuance of the current Title V permit, SECI chose not to begin construction of Unit 3 and surrendered permit No. 1070025-005-AC. Construction permit No. 1070025-004-AC, issued on June 21, 2006 for the addition of pollution control devices on Units 1 and 2, established certain interim and permanent emission limits. With the exception of the emissions limit for sulfuric acid mist (SAM), the interim limits were related to the addition of the control devices and established some limitations to avoid a PSD significant increase of collateral pollutants resulting from the operation of the new control devices. The permanent limits were all dependent upon the future operation of Unit 3. The interim emissions limit for SAM was imposed to establish a baseline for SAM emissions in order to ensure that the eventual addition of the new unit would not result in a significant emissions increase. With the addition of the new controls and the withdrawal of the construction permit for the new unit, actual SAM emissions are now less than 10% of the baseline emissions, so the emissions limit is not needed. To clearly remove this limit as an applicable requirement for the Title V permit, a minor air construction permit revision is being processed concurrently with this title V permit revision. Pursuant to the provisions of Rule 62-210.300(1)(b), F.A.C., the rest of the conditions related to the permanent limits are now considered to be obsolete and are being removed from the Title V permit through this revision without the need for additional air construction permit revisions. SECI also asked to have certain conditions pertaining to mercury limits and testing requirements deleted from the permit; however, the request will not be granted because the conditions related to mercury were established for reasons other than just the future operation of Unit 3.

STATEMENT OF BASIS

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V air operation permit revision received May 13, 2010.

Draft/proposed permit revision issued MM/DD/YY.

Public Notice published MM/DD/YY.

Final Title V permit revision effective (day 55).

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the Acid Rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility operates units subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Units 1 and 2 for the controlled emissions of particulate matter. CAM Plans are not required for NO_x and SO₂ emissions from Units 1 and 2 because continuous emissions monitoring systems (CEMS) ensure continuous compliance with the applicable emissions standards.

PROJECT REVIEW

As described in the project description, above, due to the surrender of permit No. 1070025-005-AC for the proposed construction of Unit 3, some of the conditions contained in the Title V renewal permit No. 1070025-013-AV (which were established by permit No. 1070025-004-AC) are now considered to be obsolete. The following discussion addresses the applicant's revision requests and identifies differences between this permit and the recent renewal permit. It should be noted that the request to delete the "PSD Avoidance" designation from some of the limitations established by permit No. 1070025-004-AC was not granted in all instances, since some of the limitations that were established related to the new control devices were imposed to avoid a PSD increase of a collateral pollutant. Therefore, the "PSD Avoidance" designation was removed only where appropriate. Deletions are indicated with ~~strike through~~ formatting and additions are indicated with double underline formatting.

1. The Applicant requested a change to the wording of Specific Condition **A.5.**, but the requested change would alter the intent of the original condition as it was established in the construction permit. Therefore, the requested change was not made.
2. As mentioned above, all requested deletions of conditions related to mercury emissions limits and testing requirements were not granted. Therefore, the requested changes pertaining to mercury in conditions **A.6**, **A.29**, **A.30**, and **A.32** (old **A.33**) were not granted.
3. To reflect that the lower NO_x emissions limit of 0.07 lb/MMBtu (which was established by permit No. 1070025-012-AC/PSD-FL-372A) was imposed to 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 rather than to avoid PSD review, Specific Condition **A.10.** is changed as follows:

STATEMENT OF BASIS

A.10. NO_x Emissions – PSD Avoidance.

- a. The combined NO_x emissions from Units 1 and 2 shall not exceed 0.07 lb/MMBtu based on a 12-month rolling average. Compliance shall be determined by data collected from the certified CEMS.
- b. The combined NO_x emission rate shall be computed by adding the total pounds emitted for both Units 1 and 2 divided by the total heat input (MMBtu) for both Units 1 and 2 for each 12-month rolling period.

[~~PSD Avoidance and Permit No. 1070025-012-AC/PSD-FL-372A~~]

4. Specific Condition **A.16.** is changed to remove the obsolete requirements related to Unit 3.

A.16. SO₂ Emissions – PSD Avoidance.

- ~~a. Once the upgrades authorized by Permit No. 1070025-004-AC are complete, SO₂ emissions shall not exceed 0.67 lb/MMBtu (combined for Units 1 and 2) based upon a 24 hour block average as determined by CEMS.~~
- ~~b. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), SO₂ emissions shall not exceed 0.38 lb/MMBtu (combined for Units 1 and 2), based upon a 24 hour block average as determined by CEMS.~~
- b.e. The combined SO₂ emission rate shall be computed by adding the total pounds emitted for both Units 1 and 2, divided by the total heat input (MMBtu) for both Units 1 and 2 for each 24-hour block period.

[~~PSD Avoidance and Permit No. 1070025-004-AC/PSD-FL-372~~]

5. In accordance to Permit No. 1070025-016-AC, Specific Condition **A.17.** is deleted. Specific Conditions **A.18.** – **A.40.** are renumbered to **A.17.** – **A.39.**

A.17. Sulfuric Acid Mist (SAM) – PSD Avoidance.

- ~~a. Once the upgrades authorized by Permit No. 1070025-004-AC are complete, SAM emissions 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.~~
- ~~b. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), SAM emissions shall not exceed 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.~~
- ~~c. The combined emission rate shall be computed by measuring the lb/MMBtu emission rate on each unit, multiplying each unit's maximum emission rate by its annual heat input (MMBtu), adding the total pounds emitted for both Units 1 and 2, and dividing by the total heat input (MMBtu) for both Units 1 and 2.~~

[~~PSD Avoidance and Permit No. 1070025-004-AC~~]

6. The applicant's request to delete the CO CEMS requirements contained in Specific Condition **A.22.** (old **A.23.**) was not granted.

7. Specific Condition **A.31.** is deleted due to the fact that the initial compliance tests related to the construction projects authorized by permit No. 1070025-004-AC have been completed. Specific Conditions **A.32.** – **A.39.** have been renumbered to **A.30.** – **A.37.**

~~**A.31. Initial Tests.** In accordance with EPA Method 10, the permittee shall conduct an initial stack test on each unit to verify the vendor's guarantee of 0.20 lb of CO/MMBtu. In accordance with EPA Method 18, 25, 25A or 25B, the permittee shall conduct an initial stack test on each unit to verify a maximum emissions rate of 0.06 lb of VOC/ton of coal, which was the estimated baseline emission rate for PSD avoidance. In addition, the permittee shall conduct an initial stack test in accordance with EPA Method 29, EPA Method 30B or other approved methods to demonstrate compliance with the mercury emissions cap specified in Condition **Error! Reference source not found.** of this permit. [PSD Avoidance and Permit No. 1070025-004-AC]~~

8. While it is recognized in this case that the renewal testing requirements contained in Specific Condition **A.34.** (now **A.32**) address the same pollutants as the annual compliance testing requirements contained in Specific

STATEMENT OF BASIS

Condition A.33. (now A.31), deletion of Specific Condition A.34. (now A.32) is not granted as these two conditions are part of the current permitting format created to address two different applicable requirements from the state rules.

9. Specific Condition A.40. is deleted since the requirements contained in the referenced compliance plan have been completed.

~~A.40. Compliance Plan. Based on the application, the permittee has not yet completed some of the applicable requirements of Permit Nos. 1070025-004 AC and 1070025-012 AC for these emissions units 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. Once these requirements in the Compliance Plan are complete, the Compliance Plan will be obsolete. [Rule 62-213.440(2), F.A.C.]~~

10. The Department acknowledges that SECI did not construct the emissions units related to Carbon Burn-Out (CBO™) processes and equipment that were authorized by permit No. 1070025-004-AC in Section 3, Subsection B. Because the authority to construct these emissions units expired on December 31, 2009, the conditions related to the operation of the CBO units are no longer considered to be applicable requirements for purposes of Title V permitting. Since these requirements were not included in the renewed Title V permit, there are no related changes that are required to be made during this revision project.

CONCLUSION

This project revises the Title V air operation permit No. 1070025-013-AV, which was effective on January 1, 2010. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, F.A.C.

Seminole Electric Cooperative, Inc. Seminole Generating Station

Facility ID No. 1070025

Putnam County

Title V Air Operation Permit Revision

Permit No. 1070025-015-AV

(1st Revision of Title V Air Operation Permit No. 1070025-013-AV)



Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Title V Section
2600 Blair Stone Road
Mail Station #5505
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Telephone: (850) 488-0114
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Compliance Authority:

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**Title V Air Operation Permit Revision
Permit No. 1070025-015-AV**

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DRAFT/PROPOSED PERMIT

PERMITTEE:

Seminole Electric Cooperative, Inc.
P. O. Box 272000
Tampa, Florida 33688-2000

Permit No. 1070025-015-AV
Seminole Generating Station
Facility ID No. 1070025
Title V Air Operation Permit Revision

The permit revises the Title V Air Operation Permit for the Seminole Generating Station, which is an existing power plant located in Putnam County at 890 North U. S. Highway 17 in Palatka, Florida. The map coordinates are: UTM Zone 17, 438.8 km East and 3289.2 km North; Latitude 29° 43' 59" North and Longitude 81° 37' 58" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to operate the facility; in accordance with the terms and conditions of this permit.

1070025-013-AV Effective Date: January 1, 2010

1070025-015-AV Effective Date: (Day 55)

Renewal Application Due Date: May 20, 2014

Expiration Date: December 31, 2014

(Draft/Proposed)

Joseph Kahn, Director
Division of Air Resource Management

JK/tlv/jkh/ab

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

The specific conditions in this section apply to the following emissions units.

EU No.	Brief Description
001	Electric Utility Steam Generating Unit 1 rated at a nominal gross generator rating of 735.9 MW
002	Electric Utility Steam Generating Unit 2 rated at a nominal gross generator rating of 735.9 MW

Electric Utility Steam Generating Units 1 and 2 are coal-fired, dry-bottom wall-fired utility boilers. Unit 1 began commercial operation in 1985 and Unit 2 began commercial operation in 1984. Each unit has maximum heat input rate of 7172 MMBtu per hour and a nominal gross generator rating of 735.9 MW. Each unit is equipped with the following air pollution control equipment: an electrostatic precipitator (ESP) to control PM; an upgraded wet limestone FGD system to control SO₂; low-NO_x burners, low excess air firing and a SCR system to control NO_x; and an alkali injection system to control sulfuric acid mist emissions. Each unit is equipped with CEMS to measure and record NO_x and SO₂ emissions as well as a COMS to measure and record the opacity of the exhaust gas.

{Permitting Notes: The emissions units are subject to the following primary regulations: Rule 212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) and Permit No. PSD-FL-108 (as modified): Best Available Control Technology (BACT) determinations for NO_x, PM and SO₂ emissions; the federal Acid Rain Program and Chapter 62-214, F.A.C.; NSPS Subpart A (General Provisions) in 40 CFR 60; and NSPS Subpart Da in 40 CFR 60 (Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978) adopted by reference in Rule 62-204.800, F.A.C. To control particulate matter, the ESP for each unit is operated in accordance with a Compliance Assurance Monitoring (CAM) Plan. CAM Plans are not required for NO_x and SO₂ emissions from Units 1 and 2 because CEMS ensure continuous compliance with the applicable emissions standards.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable heat input rate is as follows:

Unit No.	Fuel Type	MMBtu/hour
001	Coal	7,172
002	Coal	7,172

{Permitting Notes: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.} [Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.]

A.2. Methods of Operation – Allowable Fuels.

- The units fire coal as the primary fuel.
- The units may fire a blend of coal with a maximum of up to 30% petroleum coke by weight not to exceed 186,000 pounds of petroleum coke per hour averaged over 24 hours. The maximum sulfur content of petroleum coke shall not exceed 7.0% by weight, dry basis.
- The units may fire No. 2 fuel oil.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

d. The units may fire on-specification used oil in accordance with the following requirements.

- (1) "On-specification" used oil is defined as used oil that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below.

Constituent / Property	Allowable Level *
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100° F minimum
Polychlorinated Biphenyls (PCB)	< 50 ppm

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- (2) Used oil that does not meet all of the following specifications is considered "off-specification" oil and shall not be fired in these units.
- (3) The units shall be at normal operating temperatures to fire on-specification used oil that contains any quantifiable levels of PCB.
- (4) Each unit shall fire no more than 500,000 gallons per calendar year.

[Rule 62-213.410(1), F.A.C.; 40 CFR 271.20(e)(3); 40 CFR 279.11; PSD-FL-018(A); and Application No. 1070025-013-AV]

A.3. Hours of Operation. These emissions units may operate continuously (i.e. 8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

A.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging times for the emissions standards in this section are based on the averaging times specified in the applicable test method.

A.5. CO Emissions – PSD Avoidance. Carbon monoxide (CO) emissions from both units combined shall not exceed 12,565 tons per 12-month rolling total as determined by data collected from the required CEMS. The existing CO emission monitors which are installed in the stack shall be certified according to 40 CFR Part 60 and the data collected shall be combined and utilized to demonstrate compliance annually. [PSD Avoidance and Permit No. 1070025-004-AC/PSD-FL-372]

A.6. Mercury (Hg) Emissions – PSD Avoidance. 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 29, EPA Method 30B, other approved test methods or by data collected from a CEMS (when operational and certified). 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. {Permitting Note: Permit No. 1070025-004-AC does not require

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

the installation of a mercury CEMS; however, if a mercury CEMS is installed because of a regulatory requirement or at the election of the plant, data collected from the CEMS should be used to demonstrate compliance with the annual emissions cap.} [Permit No. 1070025-004-AC/PSD-FL-372]

A.7. NO_x Emissions – NSPS Subpart Da. NO_x emissions shall not exceed the following emission limits.

- a. NO_x emission limits.
 - (1) Bituminous coal emission limit for heat input: 260 ng/J (0.60 lb/MMBtu); and
 - (2) All other liquid fuels emission limit for heat input: 130 ng/J (0.30 lb/MMBtu).
- b. NO_x reduction requirement.
 - (1) Solid fuels: 65% reduction of potential combustion concentration; and
 - (2) Liquid fuels: 30% reduction of potential combustion concentration.

Compliance with the emission limitation and percent reduction requirements are both determined on a 30-day rolling average basis in accordance with the NSPS Subpart Da provisions. [40 CFR 60.44a(a)(1) & (2)]

A.8. NO_x Emissions – Prorated Coal with Oil. When coal and fuel oil are combusted simultaneously, the applicable standard is determined by proration using the following formula:

$$PS_{NO_x} = X(130) + Y(260) / 100$$

where:

PS_{NO_x} is the prorated standard for nitrogen oxides when combusting coal and fuel oil simultaneously (ng/J heat input).

X is the percentage of total heat input derived from the combustion of fuel oil.

Y is the percentage of total heat input derived from the combustion of coal.

[Permit No. PSD-FL-018]

A.9. NO_x Emissions – Prorated Coal with Petroleum Coke. Stack emissions from Units 1 and 2 shall comply with the following standards when burning blends of coal and petroleum coke:

- a. 0.60 lb/MMBtu heat input, and 35% of the potential combustion concentration (65% reduction). Compliance with the lb/MMBtu heat input emission limitation and the percent reduction requirement shall be determined on a 30-day rolling average basis in accordance with the NSPS Subpart Da provisions. Compliance with the 0.60 lb/MMBtu heat input emission limitation shall also constitute compliance with the 65% reduction requirement; and
- b. 0.50 lb/MMBtu heat input determined on an annual average basis, when subject to the 40 CFR 76.8 Early Election Program for Group 1, Phase II Boilers or in any year when petroleum coke is burned.

[40 CFR 60.44a(a)(1) & (2) and PSD-FL-018(A)]

A.10. NO_x Emissions—PSD Avoidance.

- a. The combined NO_x emissions from Units 1 and 2 shall not exceed 0.07 lb/MMBtu based on a 12-month rolling average. Compliance shall be determined by data collected from the certified CEMS.
- b. The combined NO_x emission rate shall be computed by adding the total pounds emitted for both Units 1 and 2 divided by the total heat input (MMBtu) for both Units 1 and 2 for each 12-month rolling period.

[~~PSD Avoidance~~ and Permit No. 1070025-012-AC/PSD-FL-372A]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

A.11. PM Emissions. No owner or operator subject to the provisions of 40 CFR 60 Subpart Da shall cause to be discharged into the atmosphere from any affected facility any gases which contain particulate matter in excess of:

- a. 13 ng/J (0.03 lb/MMBtu) heat input derived from the combustion of coal or fuel oil;
- b. 1% of the potential combustion concentration (99% reduction) when combusting solid fuel; and
- c. 30% of potential combustion concentration (70% reduction) when combusting liquid fuel.

Compliance with the 0.03 lb/MMBtu heat input emission limitation shall also constitute compliance with the 99% reduction requirement. [Permit No. PSD-FL-018(A), Permit No. 1070025-004-AC/PSD-FL-372 and 40 CFR 60.42a(a)]

A.12. SO₂ Emissions - Coal. No owner or operator subject to the provisions of 40 CFR 60 Subpart Da shall cause to be discharged into the atmosphere from any affected facility which combusts coal any gases which contain sulfur dioxide in excess of:

- a. 520 ng/J (1.20 lb/MMBtu) heat input and 10% of the potential combustion concentration (90% reduction), or
- b. 30% of the potential combustion concentration (70% reduction) when emissions are less than 260 ng/J (0.60 lb/MMBtu) heat input.

Compliance with the emission limitation and percent reduction requirements are both determined on a 30-day rolling average basis in accordance with the NSPS Subpart Da provisions. [40 CFR 60.43a(a) & (g) and Permit No. PSD-FL-018]

A.13. SO₂ Emissions - Liquid Fuel. No owner or operator subject to the provisions of 40 CFR 60 Subpart Da shall cause to be discharged into the atmosphere from any affected facility which combusts liquid fuel any gases which contain sulfur dioxide in excess of:

- a. 340 ng/J (0.80 lb/MMBtu) heat input and 10% of the potential combustion concentration (90% reduction), or
- b. 100% of the potential combustion concentration (0% reduction) when emissions are less than 86 ng/J (0.20 lb/MMBtu) heat input.

Compliance with the emission limitation and percent reduction requirements are both determined on a 30-day rolling average basis in accordance with the NSPS Subpart Da provisions. [40 CFR 60.43a(b) & (g) and Permit No. PSD-FL-018]

A.14. SO₂ Emissions – Prorated Coal with Oil. When coal and fuel oil are combusted simultaneously, the applicable standard is determined by proration using the following formula:

$$PS_{SO_2} = X(340) + Y(520) / 100$$

where:

PS_{SO₂} is the prorated standard for SO₂ when combusting coal and fuel oil simultaneously (ng/J heat input).

X is the percentage of total heat input derived from the combustion of fuel oil.

Y is the percentage of total heat input derived from the combustion of coal.

[Permit No. PSD-FL-018]

A.15. SO₂ Emissions– Prorated Coal with Petroleum Coke. Stack emissions from Units 1 and 2 shall comply with the following standards when burning blends of coal and petroleum coke:

- a. Unit 1:

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

$$E_{SO_2} = [(\%C_{HI} / 100) * (P_S) * (1 - (\%R_O / 100))] + [(1 - (\%C_{HI} / 100)) * (0.74 \text{ lb SO}_2 / \text{MMBtu})]$$

b. Unit 2:

$$E_{SO_2} = [(\%C_{HI} / 100) * (P_S) * (1 - (\%R_O / 100))] + [(1 - (\%C_{HI} / 100)) * (0.72 \text{ lb SO}_2 / \text{MMBtu})]$$

c. Where:

E_{SO_2} = allowable SO_2 emission rate (lb SO_2 /MMBtu) based on a 30-day rolling average.

$\%C_{HI}$ = percent of coal used on a heat input basis.

P_S = potential SO_2 combustion concentration (unwashed coal without emission control systems) as defined by NSPS Subpart Da; lb SO_2 /MMBtu, 30-day rolling average.

$\%R_O$ = overall percent SO_2 reduction from Equation 19-21 of EPA Reference Method 19. Per NSPS Subpart Da, $\%R_O$ must not be less than 90%, 30-day rolling average.

0.74 = historical 2-year annual average SO_2 emission rate for Unit 1, lb/MMBtu.

0.72 = historical 2-year annual average SO_2 emission rate for Unit 2, lb/MMBtu.

Compliance with the lb/MMBtu heat input emission limitations and percent reduction requirement shall be determined on a 30-day rolling average basis.

[Permit No. PSD-FL-018(A)]

A.16. ~~SO₂ Emissions—PSD Avoidance.~~

- a. ~~Once the upgrades authorized by Permit No. 1070025-004 AC are complete, SO_2 emissions shall not exceed 0.67 lb/MMBtu (combined for Units 1 and 2) based upon a 24 hour block average as determined by CEMS.~~
- b. ~~As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), SO_2 emissions shall not exceed 0.38 lb/MMBtu (combined for Units 1 and 2), based upon a 24-hour block average as determined by CEMS.~~
- b.e. The combined SO_2 emission rate shall be computed by adding the total pounds emitted for both Units 1 and 2, divided by the total heat input (MMBtu) for both Units 1 and 2 for each 24-hour block period.

[~~PSD Avoidance and Permit No. 1070025-004-AC/PSD-FL-372~~]

A.17. ~~Sulfuric Acid Mist (SAM)—PSD Avoidance.~~

- a. ~~Once the upgrades authorized by Permit No. 1070025-004 AC are complete, SAM emissions 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.~~
- b. ~~As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), SAM emissions shall not exceed 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.~~
- e. ~~The combined emission rate shall be computed by measuring the lb/MMBtu emission rate on each unit, multiplying each unit's maximum emission rate by its annual heat input (MMBtu), adding the total pounds emitted for both Units 1 and 2, and dividing by the total heat input (MMBtu) for both Units 1 and 2.~~

[~~PSD Avoidance and Permit No. 1070025-004 AC~~]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

- A.17. ~~A.18.~~—Visible Emissions.** Visible emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity. This opacity standard applies at all times except during periods of startup, shutdown and malfunction. [40 CFR 60.11(c) and 40 CFR 60.42a(b)]

Federal Excess Emissions

- A.18. ~~A.19.~~—Good Air Pollution Control Practices.** At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]

State Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision. This rule only applies to emissions limits specified by state regulations or by state permits. Specifically, this rule does not apply to Conditions A.7, A.8, A.9, A.11, A.12, A.13, A.14, A.15 and A.17~~8~~.

- A.19. ~~A.20.~~—Excess Emissions:** See Appendix CR for requirements related to excess emissions.

- A.20. ~~A.21.~~—Excess Emissions Allowed.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration. [Rules 62-210.700(1) & (5), F.A.C.]

- A.21. ~~A.22.~~—Excess Emissions Prohibited.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Continuous Monitoring Requirements

- A.22. ~~A.23.~~—CO CEMS:** To demonstrate compliance with the CO standards, the permittee shall certify, calibrate, operate and maintain a CEMS to continuously monitor and record CO emissions. The existing Thermo Electron Corp Model 48C monitors may be utilized for this purpose, provided that they are able to demonstrate compliance with 40 CFR 60 Appendix B, Performance Specification 4 and Appendix F, Quality Assurance Procedures. CEMS shall monitor and record data during all periods of operation for each unit, including startup, shutdown, malfunction or emergency conditions, but not including continuous monitoring system breakdowns, repairs, calibration checks, or zero and span adjustments. For each calendar quarter, monitor availability shall be 95% or greater. If unable to achieve this level, the permittee shall submit a report identifying the problems in achieving 95% monitor availability and a plan of corrective actions. The permittee shall implement the reported corrective actions within the next calendar quarter. [Rules 62-4.070(3), F.A.C. and Permit No. 1070025-004-AC]

- A.23. ~~A.24.~~—NO_x CEMS:** The permittee shall install, calibrate, maintain and operate a continuous monitoring system, and record the output of the system, for measuring NO_x emissions discharged to the atmosphere from each unit. The permittee shall use data collected from each CEMS to continuously demonstrate compliance with the emissions standards specified in this permit.

- The CEMS shall include the continuous measurement and recording of the oxygen (O₂) or carbon dioxide (CO₂) content of the flue gases at each location where NO_x emissions are monitored.
- The permittee has installed a NO_x CEMS according to the Acid Rain requirements of 40 CFR Part 75 and shall continue to meet the ongoing requirements of 40 CFR Part 75; however, the permittee shall also meet the requirements of 40 CFR 60.51Da. Data reported to meet the requirements of 40 CFR 60.51Da

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

(or permit limits with an averaging period of less than 12-months) shall not include data substituted using the missing data procedures in Subpart D of 40 CFR Part 75, nor shall the data have been bias adjusted according to the procedures of 40 CFR Part 75. Data collected by the Acid Rain NO_x CEMS shall be used to demonstrate compliance with the NO_x standards.

- c. The continuous monitoring systems shall be operated and data recorded during all periods of operation including periods of startup, shutdown, malfunction, or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments.

[Rules 62-4.070(3), 62-212.400 and 62-297.520, F.A.C.; Permit No. 1070025-004-AC; 40 CFR 75; and NSPS Subparts A and Da in 40 CFR 60]

A.24. A.25.—Opacity COMS. The owner or operator of an affected facility shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring the opacity of emissions discharges to the atmosphere. If opacity interference due to water droplets exists in the stack (for example, from the use of a wet FGD system), the opacity shall be monitored upstream of the interference (at the inlet to the FGD system). If opacity interference is experienced at all locations (both at the inlet and outlet of the sulfur dioxide control system), alternate parameters indicative of the particulate matter control system's performance shall be monitored (subject to the approval of the Administrator). [40 CFR 60.47a(a)]

A.25. A.26.—SO₂ CEMS. The permittee shall install, calibrate, maintain and operate a continuous monitoring system, and record the output of the system, for measuring SO₂ emissions discharged to the atmosphere from each unit. The permittee shall use data collected from each CEMS to continuously demonstrate compliance with the emissions standards specified in this permit.

- a. The CEMS shall include the continuous measurement and recording of the O₂ or CO₂ content of the flue gases at each location where NO_x emissions are monitored.
- b. The permittee has installed and certified a SO₂ CEMS according to the requirements of 40 CFR 75.20(c)(1) and appendix A to 40 CFR Part 75, and shall continue to meet the ongoing quality assurance requirements of 40 CFR 75.21 and Appendix B to 40 CFR Part 75, subject to the special provisions in 40 CFR 60.49a (b)(4). Data collected by the Acid Rain SO₂ CEMS shall be used to demonstrate compliance with the SO₂ standards.
- c. SO₂ emissions shall be monitored at both the inlet and outlet of the SO₂ control device. An "as fired" fuel monitoring system (upstream of coal pulverizers) meeting the requirements of Method 19 (Appendix A in 40 CFR 60) may be used to determine potential SO₂ emissions in place of the required continuous SO₂ emission monitor at the inlet to the SO₂ control device.
- d. The continuous monitoring systems shall be operated and data recorded during all periods of operation including periods of startup, shutdown, malfunction, or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments.

[Rules 62-4.070(3), 62-212.400 and 62-297.520, F.A.C.; Permit No. 1070025-004-AC; 40 CFR 75; and NSPS Subparts A and Da in 40 CFR 60]

Other Monitoring Requirements

A.26. A.27.—CAM Plan. To control particulate matter, the ESP for each unit shall be operated in accordance with the CAM Plan specified in Appendix CAM of this permit. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800, Rule 62-297.310(7)(b) and 62-213.440(1)(b)1.a, F.A.C.]

A.27. A.28.—On-specification Used Oil. The permittee shall conduct the following sampling and analyses to demonstrate compliance with the on-specification used oil fuel requirements.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

- a. A sample collected from each batch delivered for firing shall be analyzed, or
- b. The batch delivered is from a collection site that has an acceptable analysis already on file with the facility and the analytical results are assumed by the facility for the batch.

For quantification purposes, the highest concentration of each constituent as determined by any analysis is assumed to be the concentration of the constituent of the blended used oil. [Rules 62-4.070(3) and 62-213.440(1)(b)2.a, F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.28. A.29.—Test Methods. Required tests shall be performed in accordance with the following reference methods, the most recent versions of these methods or methods determined to be equivalent by the U.S. EPA.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5, 5B or 17	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM ₁₀ .) {Note: The sampling time for each run shall be at least 120 minutes. The sample volume for each run shall be at least 1.70 dscm (60 dscf). The probe and filter holder heating system in the sampling train may be set to provide an average gas temperature of no greater than 160° C ± 14° C (320° F ± 25° F).}
6 or 6C	Determination of Sulfur Dioxide Emissions from Stationary Sources (Method for CEMS Rata)
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources (Method for CEMS Rata)
8 or 8A	Sulfuric Acid Mist
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
18, 25, 25A or 25B	Methods for Determining Gaseous Concentrations of Volatile Organic Compounds
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)
29, 30B or other approved methods	Determination of Mercury Emissions
320 or CTM-027	Measurement of Ammonia Slip

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C. and Appendix A in 40 CFR 60]

A.29. A.30.—Continuous Compliance. The permittee shall demonstrate continuous compliance with the applicable emissions standards by collecting data with the required CEMS for the following pollutants: CO, mercury (when operational and certified), NO_x, and SO₂. The permittee shall demonstrate continuous compliance with the applicable opacity standard by collecting data with the required COMS. [Rules 62-4.070(3), 62-212.400 and 62-297.520, F.A.C.; and NSPS Subparts A and Da in 40 CFR 60]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

A.31. Initial Tests. In accordance with EPA Method 10, the permittee shall conduct an initial stack test on each unit to verify the vendor's guarantee of 0.20 lb of CO/MMBtu. In accordance with EPA Method 18, 25, 25A or 25B, the permittee shall conduct an initial stack test on each unit to verify a maximum emissions rate of 0.06 lb of VOC/ton of coal, which was the estimated baseline emission rate for PSD avoidance. In addition, the permittee shall conduct an initial stack test in accordance with EPA Method 29, EPA Method 30B or other approved methods to demonstrate compliance with the mercury emissions cap specified in Condition A.6 of this permit. [PSD Avoidance and Permit No. 1070025-004-AC]

A.30. A.32. Ammonia Slip – Tests. Within 60 days after completing construction of each SCR system and bringing each unit on line, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method 320 or CTM-027 or other methods approved by EPA. Subsequent tests shall be conducted during each federal fiscal year. If tests show ammonia slip emissions are greater than 5 ppmvd corrected to 15% O₂, the permittee shall take corrective actions such as repair, addition of catalyst, replacement of catalyst, etc. The corrective actions which are taken shall be submitted with the test data. A subsequent test shall be conducted to demonstrate that the corrective action resulted in ammonia slip emissions less than 5 ppmvd corrected to 15% O₂. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

A.31. A.33. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each unit shall be tested to demonstrate compliance with the emissions standards for ammonia slip, mercury (until CEMS are operational and certified); particulate matter and sulfuric acid mist. [Rule 62-297.310(7), F.A.C. and Permit No. Permit No. 1070025-004-AC]

A.32. A.34. Compliance Tests Prior To Renewal. Compliance tests shall be performed for ammonia slip, mercury (until CEMS are operational and certified), particulate matter and sulfuric acid mist prior to obtaining a renewed operating permit to demonstrate compliance with the corresponding emission limits. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

A.33. A.35. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

A.34. A.36. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Conditions
Quarterly Excess Emissions Report, NSPS Subpart A and Da	Within 30 days following calendar quarter	Appendices NSA and NSDa
Annual Summary of On-Specification Used Oil	April 1 st of each year	A.36
Annual Report of Maximum Petroleum Coke in Coal Blend	April 1 st of each year	A.37

See Appendix RR of this permit, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.35. A.37. On-Specification Used Oil – Records. Records shall be kept of each delivery of on-specification used oil with a statement of the origin of the used oil and the quantity delivered and stored for firing. In addition, monthly records shall be kept of the quantity of on-specification used oil fired in each unit. [Rule 62-4.070(3), F.A.C.]

A.36. A.38. On-Specification Used Oil – Summary Report. For each “Annual Operating Report (AOR) for Air Pollutant Emitting Facility”, the permittee shall provide a summary of the on-specification used oil analyses

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Electric Utility Steam Generating Unit 1 (EU-001) and Unit 2 (EU-002)

for the calendar year and identify the total quantity of on-specification used oil fired during the calendar year. [Rule 62-213.440(1)(b)2.b, F.A.C.]

A.37. ~~A.39.~~—Petroleum Coke - Reporting and Recordkeeping. Documentation verifying that the coal and petroleum coke fuel blends combusted in Units 1 and 2 have not exceeded the 30% by weight maximum petroleum coke limit shall be maintained and submitted to the Compliance Authority with each AOR. [PSD-FL-018(A)]

Other Requirements

A.40. ~~Compliance Plan.~~ Based on the application, the permittee has not yet completed some of the applicable requirements of Permit Nos. 1070025-004 AC and 1070025-012 AC for these emissions units 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. Once these requirements in the Compliance Plan are complete, the Compliance Plan will be obsolete. [Rule 62-213.440(2), F.A.C.]

APPENDIX CP
Compliance Plan

Background: For the renewal of the Title V air operation permit, the conditions of Permit No. 1070025-004 AC to add air pollution control equipment on Units 1 and 2 were incorporated. Conditions for the carbon burnout unit were not included because the permittee confirmed that the carbon burnout unit will not be installed. The conditions of Permit No. 1070025-012 AC were also incorporated into the renewal, which revised the NO_x standard in Permit No. 1070025-004 AC. The following "Compliance Plan" identifies initial tests and notifications have not yet been completed in accordance with these air construction permits. Once these items are completed, the corresponding conditions of this Compliance Plan will become obsolete and can be removed from the Title V air operation permit.

CP.1. ~~CO Emissions Cap.~~ Permit Conditions A.5 and A.6 require CEMS to be certified for Units 1 and 2 pursuant to 40 CFR 60 requirements. The CEMS shall be used to demonstrate compliance with the CO emissions cap for Units 1 and 2. The permittee shall provide documentation to the Compliance Authority and the Bureau of Air Regulation that shows the CEMS were properly certified and that CEMS data is being collected to demonstrate compliance with the CO emissions cap. [PSD Avoidance and Permit No. 1070025-004 AC]

CP.2. ~~Mercury Emissions Cap.~~ Permit Condition A.6 establishes a mercury emissions cap for Units 1, 2 *and any future emission units*. Permit Condition A.31 requires a stack test to demonstrate compliance in accordance with EPA Method 30B, 101A or 108. Once the mercury CEMS is operational and certified, compliance will be demonstrated by data collected from the CEMS. Within 45 days of completing the initial compliance tests, the permittee shall submit a report to the Compliance Authority summarizing the results. Once the mercury CEMS is operational and certified, the permittee shall notify the Compliance Authority that CEMS data is being collected to demonstrate compliance with the mercury emissions cap. [PSD Avoidance and Permit No. 1070025-004 AC]

CP.3. ~~New NO_x Emissions Limit.~~ Permit Condition A.10 establishes a NO_x emissions limit for Units 1 and 2 based on a 12-month rolling average of CEMS data once all upgrades are complete or by January 1, 2010, whichever is earlier. The permittee shall notify the Compliance Authority once all upgrades are complete and that CEMS data is being collected to demonstrate compliance with the NO_x emissions standard. [PSD Avoidance and Permit No. 1070025-004 AC]

CP.4. ~~New SO₂ Emissions Limits.~~ Permit Condition A.16 establishes an interim and a final SO₂ emissions limit for Units 1 and 2 based on 24-hour block averages as determined by CEMS. The "interim emissions limit" is effective once all upgrades are complete. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), the "permanent emissions limit" is effective. Once all upgrades are complete, the permittee shall notify the Compliance Authority and the Bureau of Air Regulation that data is being collected to demonstrate compliance with the interim SO₂ limit. Once there are initial coal fires in SGS Unit 3 (proposed), the permittee shall notify the Compliance Authority and the Bureau of Air Regulation that data is being collected to demonstrate compliance with the permanent SO₂ limit. [PSD Avoidance and Permit No. 1070025-004 AC]

CP.5. ~~New SAM Emissions Limits.~~ Permit Condition A.17 establishes an interim and a final SAM emissions limit for Units 1 and 2 as determined by stack tests. The "interim emissions limit" is effective once all upgrades are complete. As of the first monitoring period following the establishment of initial coal fires in SGS Unit 3 (proposed), the "permanent emissions limit" is effective. Once all upgrades are complete, the permittee shall notify the Compliance Authority and the Bureau of Air Regulation accordingly. Once there are initial coal fires in SGS Unit 3 (proposed), the permittee shall notify the Compliance Authority and the Bureau of Air Regulation accordingly. Within 45 days of completing the required initial compliance tests, the permittee shall submit a report to the Compliance Authority summarizing the results. [PSD Avoidance and Permit No. 1070025-004 AC]

CP.6. ~~Initial CO and VOC Tests.~~ Permit Condition A.31 requires initial stack tests on Units 1 and 2 to verify the burner vendor's guaranteed CO emissions rate and the maximum VOC emissions rate. Within 45 days of completing the initial CO and VOC stack tests, the permittee shall submit a report to the Compliance Authority summarizing the results. [PSD Avoidance and Permit No. 1070025-004 AC]

CP.7. ~~Initial Ammonia Slip Tests.~~ Permit Condition A.32 requires initial stack tests to determine the ammonia slip rate from Units 1 and 2. Within 45 days of completing the initial ammonia slip stack tests, the permittee shall submit a report to the Compliance Authority summarizing the results. [PSD Avoidance and Permit No. 1070025-004 AC]

ATTACHMENTS

Permit History

Air Permit No.	Issue/Effective Date	Expiration Date	Project Type ^{1 and 2}	Emissions Units Regulated
PA 78-10 & PSD FL-018	09/18/79 & 09/09/79	Unknown	Initial Permit	All
Revisions	10/12/88, 08/10/89, 03/26/91, 10/14/92, 11/25/92, 03/02/92, 04/25/97 & 02/07/97	N/A	Revised Permits	All
1070025-001-AV	01/01/00	12/31/04	Initial Title V	All
1070025-002-AV	01/01/05	12/31/09	Title V Renewal	All
1070025-003-AV	12/19/05	12/31/09	Title V Revision	All
1070025-004-AC	06/21/06	12/31/09	Units 1 and 2 Upgrades Construction	001-002
1070025-006-AC	10/17/07	05/01/08	Temporary Exemption RAMSORB	001-002
1070025-008-AC	04/02/08	12/31/08	Extension RAMSORB	001-002
1070025-010-AC	09/09/08	N/A	Permanent Exemption	001-002
1070025-012-AC	04/07/09	12/31/09	Lower NOx Limits	001-002
1070025-013-AV	01/01/10	12/31/14	Title V Renewal	All
<u>1070025-014-AC</u>	<u>02/24/10</u>	<u>03/31/12</u>	<u>Units 1 and 2 Steam Turbine Upgrades</u>	<u>001-002</u>
<u>1070025-015-AV</u>	<u>(Day 55)</u>	<u>12/31/14</u>	<u>Title V Revision To Remove Unit 3</u>	<u>001-002</u>
<u>1070025-016-AC</u>	<u>Mm/dd/yy</u>	<u>N/A</u>	<u>Minor AC revision to remove SAM limit</u>	<u>001-002</u>

Project Types:

- 1 Title V Permits: Initial, Revision, Renewal, Administrative Correction, Withdrawn or Denied
- 2 Construction Permits: New, Modification, Extension, Exemption, Withdrawn or Denied

ATTACHMENTS

Table 1. Summary of Air Pollutant Standard and Terms

Table 1 Summary of Air Pollutant Standards and Terms										
SEMINOLE ELECTRIC COOPERATIVE, INC.										
SEMINOLE GENERATING STATION (No. 1070025)										
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.										
EU ID	EU Description	Parameters			Allowable Emissions			Equivalent Emissions		See Permit Conditions
		Pollutant	Fuels	Hours/Year	Standards	lb/hour	TPY	lb/hour	TPY	
001 and 002	Electric Utility Steam Generating Unit 1 and Electric Utility Steam Generating Unit 2	CO	All	8760	12,565 tons/12-month rolling total cap for Units 1 and 2	N/A	12,565	N/A	12,565	A.5
		Mercury	All	8760	0.059 tons/year cap for all boilers	N/A	0.059	N/A	0.059	A.6
		NOX	Coal	8760	0.6 lb/MMBtu, 30-day rolling avg.	N/A	N/A	N/A	37,696 N/A	A.7
		NOX	Oil	8760	0.3 lb/MMBtu, 30-day rolling avg.	N/A	N/A	N/A	N/A	A.7
		NOX	Coal/ Petcoke	8760	0.6 lb/MMBtu, 30-day rolling avg.	N/A	N/A	N/A	37,696 N/A	A.9
		NOX	Coal/ Petcoke	8760	0.5 lb/MMBtu, annual avg.	N/A	N/A	N/A	31,413 N/A	A.9
		NOX	All	8760	0.07 lb/MMBtu, 12-month rolling avg. (combined average for 1 and 2)	N/A	N/A	N/A	4,398	A.10
		PM	All	8760	0.03 lb/MMBtu	N/A	N/A	430	1,883	A.11
		SO2	Coal	8760	1.2 lb/MMBtu, 30-day rolling avg.	N/A	N/A/	N/A	75,392 N/A	A.12
		SO2	Oil	8760	0.80 lb/MMBtu, 30-day rolling avg.	N/A	N/A	N/A	N/A	A.13
		SO2	All	8760	Interim: 0.67 lb/MMBtu, 24-hour block avg. (combined average for 1 and 2)	N/A	N/A	9,610	42,092	A.16
		SO2	All	8760	Permanent: 0.38 lb/MMBtu, 24-hour block avg. (combined average for 1 and 2)	N/A	N/A	5451	23,875	A.16
		SAM	All	8760	0.096 lb/MMBtu	N/A	N/A	1,377	6,031	A.17
		SAM	All	8760	0.031 lb/MMBtu	N/A	N/A	445	1,949	A.17
			Opacity	All	8760	Normal: 20% opacity, 6-minute avg. Exception: 27% opacity for one 6-minute avg. per hour			N/A	N/A
004	Coal Storage Yard	Opacity	All	8760	Normal: 20% opacity, 6-minute avg.			N/A	N/A	B.3
005	Limestone and FGD Sludge Handling and Storage	Opacity	All	8760	Normal: 20% opacity, 6-minute avg.			N/A	N/A	C.3
Notes:										
Hourly and annual emissions are for both units combined										
The "Equivalent Emissions" listed are for informational purposes only.										

ATTACHMENTS

Table 2. Summary of Compliance Requirements

Table 2. Summary of Compliance Requirements								
SEMINOLE ELECTRIC COOPERATIVE, INC.								
SEMINOLE GENERATING STATION (ID No. 1070025)								
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.								
EU ID	EU Description	Pollutant Name or Parameter	Fuels	Compliance Method	Testing Frequency	Minimum Compliance Test Duration	CMS	See Permit Conditions
001 & 002	Steam Electric Generator No. 1 and 2	Opacity	All	COMS	Continuous	6-minute avg, 60 minute test	Yes	A.19,24
		Opacity	All	EPA METHOD 9	NONE REQUIRED	6-minute avg, 60 minute test	Yes	A.19,24
		CO	All	CO CEMS	Continuous	12-month rolling avg.	Yes	A.5
		NOX	All	NOx CEMS	Continuous	12-month rolling avg.	Yes	A.10
		NOX	All	NOx CEMS	Continuous	30-day rolling avg.	Yes	A.9
		SO2	All	SO2 CEMS	Continuous	24-hour block avg.	Yes	A.17
		SO2	All	SO2 CEMS	Continuous	30-day rolling avg.	Yes	A.13
		Ammonia Slip	All	CTM-027, Method 320	Annual, <u>Renewal</u>	3, 1-hour test runs	No	A.33 A.31, A.32
		CO	All	EPA Method 10	Initial	3, 1-hour test runs	Yes	A.31
		Mercury	All	EPA Method 30B, 101 A or 108	Annual, <u>Renewal</u>	3, 1-hour test runs	No	A.6, A.31, A.32
		PM	All	EPA Method 5, 5B, 17	Annual	3, 1-hour test runs	No	A.12, A.31
		SAM	All	EPA Method 8 or 8A	Annual	3, 1-hour test runs	No	A.18
		VOC	All	EPA Methods 18, 25, 25A, or 25B	Initial	3, 1-hour test runs	No	A.31
4	Coal Storage Yard	VE20	All	EPA METHOD 9	Annual	30-minutes	No	B.3
5	Limestone and FGD Sludge Handling and Storage	VE20	All	EPA METHOD 9	Annual	30-minutes	No	C.3
<u>Notes:</u>								
1. The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.								
2. CMS means continuous monitoring system								
3. Annual tests required during each federal fiscal year (October 1st - September 30th)								

Friday, Barbara

To: 'mopalinski@seminole-electric.com'
Cc: Mike Roddy; 'Tom Davis'; rmanning@hgslaw.com; 'Forney.Kathleen@epamail.epa.gov'; Oquendo.Ana@epamail.epa.gov; jalves@hgslaw.com; Catherine_collins@fws.gov; Kirts, Christopher; Halpin, Mike; mreimer@earthjustice.org; dguest@earthjustice.org; acoe@earthjustice.org; preston@fwfonline.org; kristin.henry@sierraclub.org; joanne.spalding@sierraclub.org; gadavis@enviroattorney.com; phyllisfox@gmail.com; gcavros@att.net; Gibson, Victoria; Bass, Andrew; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B
Attachments: 1070025-015-AV-016-ACSignedCombinedWrittenNoticeofIntent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** 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).

Attention: Andrew Bass

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: SEMINOLE GENERATING STATION
Project Number: 1070025-015-AV/1070025-016-AC
Permit Status: DRAFT/PROPOSED – DRAFT CONSTRUCTION
Permit Activity: PERMIT REVISION
Facility County: PUTNAM

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.015.AV.D_pdf.zip

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.016.AC.D_pdf.zip

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Permit project documents that 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.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

Friday, Barbara

From: Microsoft Exchange
To: mopalinski@seminole-electric.com; Mike Roddy
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

mopalinski@seminole-electric.com

[Mike Roddy](#)

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Mike Roddy [WMRoddy@seminole-electric.com]
Sent: Monday, July 12, 2010 12:19 PM
To: Friday, Barbara
Subject: Re: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Documents received

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 7/12/2010 11:39 AM >>>

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** 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).

Attention: Andrew Bass

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: SEMINOLE GENERATING STATION
Project Number: 1070025-015-AV/1070025-016-AC
Permit Status: DRAFT/PROPOSED – DRAFT CONSTRUCTION
Permit Activity: PERMIT REVISION
Facility County: PUTNAM

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.015.AV.D_pdf.zip

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.016.AC.D_pdf.zip

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

Permit project documents that 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.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

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Friday, Barbara

From: Microsoft Exchange
To: Tom Davis
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Tom Davis

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Monday, July 12, 2010 3:39 PM
To: Friday, Barbara
Subject: RE: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Dear Barbara,

I have received and can access the documents referenced in your email below.

Thanks.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, July 12, 2010 11:40 AM
To: mopalinski@seminole-electric.com
Cc: Mike Roddy; Tom Davis; rmanning@hgslaw.com; Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; jalves@hgslaw.com; Catherine_collins@fws.gov; Kirts, Christopher; Halpin, Mike; mreimer@earthjustice.org; dguest@earthjustice.org; acoe@earthjustice.org; preston@fwfonline.org; kristin.henry@sierraclub.org; joanne.spalding@sierraclub.org; gadavis@enviroattorney.com; phyllisfox@gmail.com; gcavros@att.net; Gibson, Victoria; Bass, Andrew; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** 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).

Attention: Andrew Bass

Owner/Company Name: SEMINOLE ELECTRIC COOPERATIVE, INC.
Facility Name: SEMINOLE GENERATING STATION
Project Number: 1070025-015-AV/1070025-016-AC
Permit Status: DRAFT/PROPOSED – DRAFT CONSTRUCTION
Permit Activity: PERMIT REVISION
Facility County: PUTNAM

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.015.AV.D_pdf.zip

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070025.016.AC.D_pdf.zip

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

Permit project documents that 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.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: rmanning@hgslaw.com; jalves@hgslaw.com
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

rmanning@hgslaw.com

jalves@hgslaw.com

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Robert Manning [RobertM@hgslaw.com]
To: Friday, Barbara
Sent: Monday, July 12, 2010 11:59 AM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station;1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 12, 2010 11:59:23 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: James Alves [JimA@hgslaw.com]
To: Friday, Barbara
Sent: Monday, July 12, 2010 11:59 AM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 12, 2010 11:58:54 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Kirts, Christopher; Halpin, Mike; Holtom, Jonathan; Gibson, Victoria
Sent: Monday, July 12, 2010 11:40 AM
Subject: Delivered: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message has been delivered to the following recipients:

Kirts, Christopher

Halpin, Mike

Holtom, Jonathan

Gibson, Victoria

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Kirts, Christopher
To: Friday, Barbara
Sent: Wednesday, July 14, 2010 3:31 PM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Wednesday, July 14, 2010 3:31:22 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Halpin, Mike
Sent: Monday, July 12, 2010 11:41 AM
To: Friday, Barbara
Subject: Delivered: Seminole Electric Cooperative, Inc. - Seminole Generating Station;1070025-015-AV/1070025-016-AC/PSD-FL-372B
Attachments: ATT00001

Your message was delivered to the recipient.

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Monday, July 12, 2010 12:20 PM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 12, 2010 12:20:26 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, July 13, 2010 11:41 AM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Tuesday, July 13, 2010 11:40:32 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
To: Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Forney.Kathleen@epamail.epa.gov

Oquendo.Ana@epamail.epa.gov

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Friday, Barbara

From: Microsoft Exchange
To: Catherine_collins@fws.gov
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Catherine_collins@fws.gov

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Catherine_Collins@fws.gov
Sent: Monday, July 12, 2010 1:18 PM
To: Friday, Barbara
Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Return Receipt

Your document: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B
was Catherine_Collins@fws.gov
received by:
at: 07/12/2010 11:18:07 AM

Friday, Barbara

From: Microsoft Exchange
To: mreimer@earthjustice.org; dguest@earthjustice.org; acoe@earthjustice.org
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

mreimer@earthjustice.org

dguest@earthjustice.org

aco@earthjustice.org

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Monica Reimer [mreimer@earthjustice.org]
To: Friday, Barbara
Sent: Monday, July 12, 2010 11:41 AM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 12, 2010 11:40:37 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: preston@fwfonline.org
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

preston@fwfonline.org

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Preston Robertson [preston@fwfonline.org]
Sent: Wednesday, July 14, 2010 9:10 AM
To: Friday, Barbara
Subject: Read: SPAM-MED: Seminole Electric Cooperative, Inc. - Seminole Generating Station;
1070025-015-AV/1070025-016-AC/PSD-FL-372B
Attachments: ATT00001

Friday, Barbara

From: Microsoft Exchange
To: kristin.henry@sierraclub.org; joanne.spalding@sierraclub.org
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

kristin.henry@sierraclub.org

joanne.spalding@sierraclub.org

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Kristin Henry [Kristin.Henry@sierraclub.org]
Sent: Wednesday, July 14, 2010 10:28 AM
To: Friday, Barbara
Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Return Receipt

Your document: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

was received by: Kristin Henry/Sierraclub

at: 07/14/2010 07:28:22 AM

Friday, Barbara

From: Joanne Spalding [Joanne.Spalding@sierraclub.org]
Sent: Monday, July 12, 2010 11:42 AM
To: Friday, Barbara
Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Return Receipt

Your document: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

was received by: Joanne Spalding/Sierraclub

at: 07/12/2010 08:42:20 AM

Friday, Barbara

From: Kristin Henry [Kristin.Henry@sierraclub.org]
Sent: Monday, July 12, 2010 11:40 AM
To: Friday, Barbara
Subject: AUTO: Kristin Henry is out of the office

I am out of the office from Mon 02/15/2010 until Wed 09/01/2010.

I am on maternity leave for the next few months. If you need assistance, please call Katie Schaeffer at 415-977-5693 and she will direct you to the appropriate person.

Note: This is an automated response to your message "Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B" sent on 07/12/2010 08:39:39 AM.

This is the only notification you will receive while this person is away.

Friday, Barbara

From: Microsoft Exchange
To: gadavis@enviroattorney.com
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

gadavis@enviroattorney.com

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Microsoft Exchange
To: phyllisfox@gmail.com
Sent: Monday, July 12, 2010 11:40 AM
Subject: Relayed: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

phyllisfox@gmail.com

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: phyllisfox@gmail.com
Sent: Monday, July 12, 2010 11:40 AM
To: Friday, Barbara
Subject: Delivered: Seminole Electric Cooperative, Inc. - Seminole Generating Station;1070025-015-AV/1070025-016-AC/PSD-FL-372B
Attachments: ATT00001

Your message was delivered to the recipient.

Friday, Barbara

From: Microsoft Exchange
To: gcavros@att.net
Sent: Monday, July 12, 2010 11:40 AM
Subject: Undeliverable: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Delivery has failed to these recipients or distribution lists:

gcavros@att.net

An error occurred while trying to deliver this message to the recipient's e-mail address. Microsoft Exchange will not try to redeliver this message for you. Please try resending this message, or provide the following diagnostic text to your system administrator.

The following organization rejected your message: att.net.

Sent by Microsoft Exchange Server 2007

Diagnostic information for administrators:

Generating server: ECHCAS1.floridadep.net

gcavros@att.net

att.net #550 [SUSPEND] Mailbox currently suspended - Please contact correspondent directly ##

Original message headers:

Received: from ECHMBB.floridadep.net (:::1) by ECHCAS1.floridadep.net (:::1) with mapi; Mon, 12 Jul 2010 11:39:40 - 0400

From: "Friday, Barbara" <Barbara.Friday@dep.state.fl.us>

To: "mopalinski@seminole-electric.com" <mopalinski@seminole-electric.com>

CC: Mike Roddy <WMRoddy@seminole-electric.com>, Tom Davis <tdavis@ectinc.com>,

"rmanning@hgslaw.com" <rmanning@hgslaw.com>,

"Forney.Kathleen@epamail.epa.gov" <Forney.Kathleen@epamail.epa.gov>,

"Oquendo.Ana@epamail.epa.gov" <Oquendo.Ana@epamail.epa.gov>,

"jalves@hgslaw.com" <jalves@hgslaw.com>, "Catherine.collins@fws.gov"

<Catherine.collins@fws.gov>, "Kirts, Christopher"

<Christopher.Kirts@dep.state.fl.us>, "Halpin, Mike"

<Mike.Halpin@dep.state.fl.us>, "mreimer@earthjustice.org"

<mreimer@earthjustice.org>, "dquest@earthjustice.org"

<dquest@earthjustice.org>, "acoe@earthjustice.org" <acoe@earthjustice.org>,

"preston@fwfonline.org" <preston@fwfonline.org>,

"kristin.henry@sierraclub.org" <kristin.henry@sierraclub.org>,

"joanne.spalding@sierraclub.org" <joanne.spalding@sierraclub.org>,

"gadavis@enviroattorney.com" <gadavis@enviroattorney.com>,

"phyllisfox@gmail.com" <phyllisfox@gmail.com>, "gcavros@att.net"

Friday, Barbara

From: Microsoft Exchange
To: Bass, Andrew; Walker, Elizabeth (AIR)
Sent: Monday, July 12, 2010 11:40 AM
Subject: Delivered: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message has been delivered to the following recipients:

Bass, Andrew

Walker, Elizabeth (AIR)

Subject: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Bass, Andrew
To: Friday, Barbara
Sent: Monday, July 19, 2010 8:01 AM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 19, 2010 8:01:11 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Walker, Elizabeth (AIR)
Sent: Monday, July 12, 2010 11:45 AM
To: Friday, Barbara
Subject: Delivered: Seminole Electric Cooperative, Inc. - Seminole Generating Station;1070025-015-AV/1070025-016-AC/PSD-FL-372B
Attachments: ATT00001

Your message was delivered to the recipient.

Friday, Barbara

From: Walker, Elizabeth (AIR)
To: Friday, Barbara
Sent: Monday, July 12, 2010 6:27 PM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 12, 2010 6:27:27 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Monday, July 12, 2010 11:48 AM
Subject: Read: Seminole Electric Cooperative, Inc. - Seminole Generating Station; 1070025-015-AV/1070025-016-AC/PSD-FL-372B

Your message was read on Monday, July 12, 2010 11:47:48 AM (GMT-05:00) Eastern Time (US & Canada).