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June 15, 2012

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DIVISION OF AIR  
RESOURCE MANAGEMENT

Mr. Jeff Koerner, P.E.  
Administrator, Office of Permitting and Compliance  
Florida Department of Environmental Protection  
Division of Air Resource Management  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Project No 1070025-019-AC

Re: Seminole Electric Cooperative, Inc.  
Seminole Generating Station Units 1 and 2  
Request for Permit Modification – Removal of Petroleum Coke, New SO<sub>2</sub> Limit

Dear Mr. Koerner:

Seminole Electric Cooperative, Inc. (SECI) operates two solid fuel-fired electrical generating units (EGUs) at its Seminole Generating Station (SGS) located near Palatka, Putnam County, Florida. Operation of SGS Units 1 and 2 is currently authorized by Florida Department of Environmental Protection (FDEP) Title V Final Permit No. 1070025-017-AV, issued with an effective date of January 1, 2010, and an expiration date of December 31, 2014.

Pursuant to a request by FDEP, SECI submitted a Reasonable Progress analysis for SGS Units 1 and 2 to the Department on May 30, 2012. This analysis indicated that SECI would seek a permit modification to remove petroleum coke as an approved fuel for Units 1 and 2. Removal of petroleum coke as an authorized fuel will reduce the potential sulfur dioxide (SO<sub>2</sub>) loading to the flue gas desulfurization (FGD) control systems resulting in lower potential outlet SO<sub>2</sub> emissions rates.

In its RP submittal, SECI also committed to upgrading the existing flue gas desulfurization (FGD) emissions controls to achieve a minimum sulfur dioxide (SO<sub>2</sub>) removal efficiency of 95 percent or, alternatively, an equivalent SO<sub>2</sub> emissions rate of no more than 0.25 pound per million British thermal units (lb/MMBtu) of SO<sub>2</sub> on a 30-day rolling average basis for both limits. The upgrades to the existing FGD emissions controls will be completed no later than March 1, 2016. Since Seminole is making these commitments as a cooperative effort to assist in the development of FDEP's Regional Haze SIP, however, the removal of the authority to burn petcoke and the upgrades to the FGD system should only become effective after EPA approves FDEP's Regional Haze SIP in this regard.

Accordingly, SECI requests revisions to the following permit conditions of Title V Air Operation Permit No. 1070025-017-AV and concurrently to previously issued Air -Construction Permit No. Air Construction Permit No. PSD-FL-018(A), which would only become effective after EPA approves FDEP's Haze SIP:

(1) Title V Permit Condition A.2 – Allowable Fuels

- A.2. Methods of Operation – Allowable Fuels.  
a. The units fire coal as the primary fuel.

- b. ~~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.~~
- be. The units may fire No. 2 fuel oil.
- cd. (1) through (4) – no change

[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]

(2) Title V Permit Condition A.9 – NO<sub>x</sub> Emissions – Prorated Coal with Petroleum Coke

~~A.9. NO<sub>x</sub> Emissions – Prorated Coal with Petroleum Coke.~~

Delete Condition A.9.

(3) Title V Permit Condition A.12 – SO<sub>2</sub> Emissions – Coal

- c. 95 percent removal or, alternatively, an equivalent SO<sub>2</sub> emissions rate of no more than 0.25 pound per million British thermal units (lb/MMBtu) of SO<sub>2</sub> on a 30-day rolling average basis for both limits. These limits become effective on March 16, 2016, and only if EPA approves Florida's Regional Haze SIP in this regard.

(4) Title V Permit Condition A.15 – SO<sub>2</sub> Emissions – Prorated Coal with Petroleum Coke

~~A.15. SO<sub>2</sub> Emissions – Prorated Coal with Petroleum Coke.~~

Delete Condition A.15.

(5) Title V Permit Condition A.34 – Reporting Schedule

A.34. 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 <sup>st</sup> of each year	A.36
Annual Report of Maximum Petroleum Coke in Coal Blend	April 1 <sup>st</sup> of each year	A.37

(6) Title V Permit Condition A.37 – Petroleum Coke – Reporting and Recordkeeping

~~A.37. Petroleum Coke – Reporting and Recordkeeping.~~

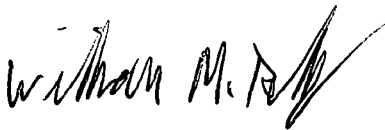
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Delete Condition A.37.

In support of this request for operating and construction permit condition revisions, a completed Application for Air Permit - Long Form (Application Information section only, including Responsible Official and Professional Engineer certifications) is enclosed.

Please contact Juan Ramirez (813) 739-1219 if there are any questions regarding this permit revision request.

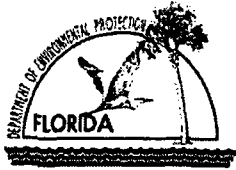
Sincerely,

A handwritten signature in black ink, appearing to read "William M. Roddy", with a stylized flourish at the end.

William M. Roddy  
Director of Environmental Affairs

Attachments:

Seminole Generating Station--Application for Air Permit - Long Form



# Department of Environmental Protection

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## Division of Air Resource Management

DIVISION OF AIR  
RESOURCE MANAGEMENT

### APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>Seminole Electric Cooperative, Inc.</b>	
2. Site Name: <b>Seminole Generating Station</b>	
3. Facility Identification Number: <b>1070025</b>	
4. Facility Location: Street Address or Other Locator: <b>890 North U.S. Highway 17</b> City: <b>Palatka</b> County: <b>Putnam</b> Zip Code: <b>32177-9647</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Juan Ramirez, Senior Environmental Engineer</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Seminole Electric Cooperative, Inc.</b> Street Address: <b>16313 North Dale Mabry Highway</b> City: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33618-1427</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(813) 739-1219 ext.</b> Fax: <b>(813) 264-7906</b>	
4. Application Contact Email Address: <b>jramirez@seminole-electric.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application: <b>6-29-12</b>	3. PSD Number (if applicable):
2. Project Number(s): <b>1070025-0119-AC</b>	4. Siting Number (if applicable):

## APPLICATION INFORMATION

### Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

#### **Air Construction Permit**

- ☐ Air construction permit.
- ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

#### **Air Operation Permit**

- ☐ Initial Title V air operation permit.
- ☐ Title V air operation permit revision.
- ☐ Title V air operation permit renewal.
- ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

- ☒ Air construction permit and Title V permit revision, incorporating the proposed project.
- ☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- ☒ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

**Operation of the Seminole Generating Station (SGS) is currently authorized by Florida Department of Environmental Protection Title V Air Operation Permit No. 1070025-017-AV issued with an effective date of January 1, 2010 and an expiration date of December 31, 2014.**

**This application requests revisions to current Title V air operation permit conditions and to previously issued Air Construction Permit No. PSD-FL-018(A) to remove petroleum coke as an authorized fuel for SGS Units 1 and 2 and request an additional SO<sub>2</sub> emission limit for coal.**

## APPLICATION INFORMATION

### Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	Steam Electric Generator No. 1	N/A	N/A
002	Steam Electric Generator No. 2	N/A	N/A

### Application Processing Fee

Check one: ☐ Attached - Amount: \$ \_\_\_\_\_ ☒ Not Applicable

**Note:** SGS has been issued Final Title V Operation Permit Number 1070025-017-AV. An application processing fee is not required pursuant to Rule 62-213.205(4), F.A.C.

## APPLICATION INFORMATION

Owner/Authorized Representative Statement **NOT APPLICABLE**

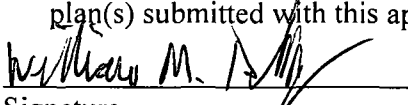
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature _____ Date _____

## APPLICATION INFORMATION

### Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>William M. Roddy, Director of Environmental Affairs</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>Seminole Electric Cooperative, Inc.</b> Street Address: <b>16313 North Dale Mabry Highway</b> City: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33618-1427</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(813) 739 - 1224</b> ext. Fax: <b>(813) 264-7906</b>
5. Application Responsible Official E-mail Address: <b>wmroddy@seminole-electric.com</b>
6. Application Responsible Official Certification: <p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p> Signature</p> <p><u>6/15/12</u> Date</p>



## APPLICATION INFORMATION

### Professional Engineer Certification

1. Professional Engineer Name: **Thomas W. Davis**

Registration Number: **36777**

2. Professional Engineer Mailing Address...

Organization/Firm: **Environmental Consulting & Technology, Inc.**

Street Address: **3701 NW 98<sup>th</sup> Street**

City: **Gainesville**

State: **Florida**

Zip Code: **32606-5004**

3. Professional Engineer Telephone Numbers...

Telephone: **(352) 248 - 3351** ext.

Fax: **(352) 332 - 6722**

4. Professional Engineer E-mail Address: **tdavis@ectinc.com**

5. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐ , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.*

*(4) If the purpose of this application is to obtain an air construction permit (check here ☐ , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☒ , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here*

*if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

Signature

Date

6/15/12

\*Attach any exception to certification statement.