Seminole Electric
COOPERATIVE, INC.
IN PARTNERSHIP WITH THOSE WE SERVE

RECEIVED
JUL 14 2000
BUREAU OF AIR REGULATION

July 12, 2000

Mr. David Norse
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

RE: Title V Permit No.: 1070025-001-AV

Dear Mr. Norse:

As part of the periodic monitoring requirements of our Title V Permit , Seminole Electric Cooperative, Inc. is submitting the Differential Pressure Action Plan persuant to the permitting notes contained in Sections C.9 and D.9 of the permit. If you have any questions please contact me at (813) 963-0994, ext 1224.

Sincerely,

Mike Roddy
Senior Environmental Engineer

7/14/00
cc: E. Svec (FDEP, Tallahassee)

16313 North Dale Mabry Highway P.O. Box 272000 Tampa, Florida 33688-2000
Telephone 813.963.0994 Fax 813.264.7906 www.seminole-electric.com

Differential Pressure (DP) Action Plan

(1) Emission Unit I.D. No.: 004
Brief Description: Coal Storage Yard

EQUIPMENT	DP OPERATING RANGES
(CH-002) AS-RECEIVED TOWER	2" TO 8"
(CH-011) AS-FIRED TOWER	2" TO 8"
(CH-012a) CB-9A (TRIPPERS)	2" TO 8"
(CH-012b) CB-9B (TRIPPERS)	2" TO 8"

(2) Emission Unit I.D. No.: 005
Brief Description: Limestone and FGD Sludge Handling and Storage

EQUIPMENT	DP OPERATING RANGES
(L-001) LIMESTONE UNLOADING BREAKING	0" TO 3"
(FGD-001 SOUTH LIME PNEUMATIC UNLOADING	5" TO 8"
(FGD-002 NORTH LIME PNEUMATIC UNLOADING	5" TO 8"
(FGD LIME TO SILO V-152)	0" TO 4"
(FGD-004) CEDAR BAY ASH TO SILO V-151	0" TO 4"
(FGD-005) FLYASH TO SILO V142	0" TO 4"
(FGD-006) FLYASH TO SILO V141	0" TO 4"
(FGD-007) FLYASH SILO V142 UNLOADING TO TRUCK	0" TO 5"
(FGD-008) FLYASH SILO V141 UNLOADING TO TRUCK	0" TO 5"
(FGD-009) PUGMILL 131	10" TO 15"
(FGD-010) PUGMILL 132	10" TO 15"

Action Taken When Differential Pressure is out of Range

(If DP is Below Range)

A. Check belts for slippage and proper rotation
B. Inspect DP gauges
C. Inspect filters for damage
D. Conduct repairs or replace parts/filters immediately

(If DP is above range)

A. Inspect filters for damage and moisture
B. Inspect solenoids for proper firing, also inspect for leaks
C. Inspect system for proper air pressure
D. Inspect air dryers for proper orientation
E. Inspect D.P. gauge
F. Conduct repairs or replace parts/filters immediately

File \ Barbara

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

November 20, 2000

Mr. Mike Roddy
Senior Environmental Engineer
Seminole Electric Cooperative, Inc.
16313 N. Dale Mabry Highway
Tampa, Florida 33688-2000

Re: Recognition of Latex Binder as a Dust Suppressant

Dear Mr. Roddy:

We have received your request to begin using a latex binder on your coal as a means of suppressing fugitive dust (Latex DL 298NA, made by DOW Chemical Company). We have also received a certification from your Professional Engineer detailing the lack of detrimental environmental effects resulting from the use of this product.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-3, condition 57.). This authorization is only valid if the Latex DL 298NA is used as a surface coating dust suppressant. We have not reviewed, nor approved, the use of Latex DL 298NA as a "glue" for binding coal dust together to form a pellet or briquette. This type of use would require a permit revision to identify a new method of operation.

For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that Latex DL 298NA is the only material that has been applied to your coal. If Seminole Electric or the coal supplier desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letter head address.

Sincerely,

C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jh

cc: Mr. Mike Opalinski, Seminole Electric Cooperative
Mr. Thomas W. Davis, P.E., ECT
Mr. Buck Oven, P.E., DEP
Mr. Chris Kirts, P.E., DEP-NED

Seminole Electric
COOPERATIVE, INC.
IN PARTNERSHIP WITH THOSE WE SERVE

November 11, 2000

RECEIVED
NOV 17 2000
BUREAU OF AIR REGULATION

Mr. Jonathan Holtom
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Holtom:

Seminole Electric Cooperative, Inc.(SECI) is currently in the process of evaluating coal supply bid proposals. One of the proposals involves Synfuel supplied by TECO Coal Corporation. This Synfuel is pelletized raw coal held together with a *Covol Technologies, Inc.* polymer binder which only comprises 0.1 % by weight of the coal pellets. Attached please find copies of the Material Safety Data Sheets for both the Synfuel pellets and the polymer binder (Latex DL 298NA) along with the Professional Engineer's Certification. SECI is currently considering the purchase of 300,000 tons of this fuel and would like the Department's concurrence as to its use. We are on an extremely tight schedule for the contract negotiations and would greatly appreciate a response as soon as possible.

Thank you for your assistance in this matter and if you have any questions or require additional information please call me at (813) 963-0994 extension 1224.

Sincerely,

Mike Roddy
Senior Environmental Engineer

16313 North Dale Mabry Highway P.O. Box 272000 Tampa, Florida 33688-2000
Telephone 813.963.0994 Fax 813.264.7906 www.seminole-electric.com

ECT
Environmental Consulting & Technology, Inc.

November 15, 2000

Mr. Mike Roddy
Senior Environmental Engineer
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, FL 33688-2000

Re: Seminole Electric Cooperative, Inc.
Palatka Power Plant
FDEP Final Permit No.: 1070025-001-AV
Use of Synthetic Fuel Pellets

Dear Mr. Roddy:

In response to a request by the Florida Department of Environmental Protection (FDEP), this letter provides a professional engineer certification with respect to several environmental issues concerning the use of synthetic fuel pellets. The synthetic fuel pellets consist of coal that has been treated with a binder. The coal binder will serve to reduce fugitive particulate matter emissions during synthetic fuel pellet handling and storage. This certification addresses the collateral issues of: (a) potential emissions of volatile organic compound (VOC) emissions, (b) binder combustion emissions, and (c) potential surface runoff contamination. Each of these issues are discussed in the following sections:

A. Potential for VOC Emissions

The synthetic fuel pellet binder (LATEX DL 298NA) is a latex material manufactured by the Dow Chemical Company. The Material Safety Data Sheet (MSDS) indicates that the product is a milky white liquid emulsion comprised of a proprietary carboxylated styrene/butadiene polymer (from 40 to 62 percent by weight) and water (from 38 to 60 percent by weight). The physical and chemical properties section of the MSDS shows a vapor pressure of 17.5 mm Hg (0.338 psia) at 20°C (68°F) and a boiling point of 100°C (212°F) for the latex polymer/water product. Pure water at 20°C has the same vapor pressure and boiling point. Accordingly, the latex polymer component of the LATEX DL 298NA polymer/water mixture does not contribute to the volatility to the product. VOC emissions due to evaporative losses from the binder will therefore be negligible.

B. Synthetic Fuel Pellet Binder Combustion Emissions

The LATEX DL 298NA material is a liquid emulsion comprised of a polymerized hydrocarbon (i.e., carboxylated styrene/butadiene polymer) and water. The high

3701 Northwest 98th Street
Gainesville, FL 32606

(352) 332-0444

FAX (352) 332-6722

An Equal Opportunity/Affirmative Action Employer

combustion temperatures and combustion residence times occurring in the Palatka Power Plant coal-fired units would be expected to result in essentially complete combustion of the LATEX DL 298NA material to carbon dioxide (CO_2) and water (H_2O). The LATEX DL 298NA material also represents a very small portion of the synthetic fuel pellets (i.e., 0.1 weight percent).

C. Potential Surface Runoff Contamination

The LATEX DL 298NA MSDS indicates that the polymer component of the LATEX DL 298NA material is insoluble in water. Once applied, the polymer component of the LATEX DL 298NA material would be expected to remain with the synthetic fuel pellet (due to its insolubility in water) and ultimately be oxidized in the Palatka Power Plant boilers. Surface runoff from the synthetic fuel pellet handling and storage areas would therefore be expected to have negligible amounts of the water insoluble polymer component of the LATEX DL 298NA binder material.

Please contact me at (352) 332-6230, Ext. 351 if there are any questions regarding this certification.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Professional Engineer Statement:

I, the undersigned, hereby certify that:

To the best of my knowledge, the emission estimates reported in this certification are true, accurate, and complete based upon reasonable techniques available for estimating emissions.

REGISTERED PROFESSIONAL ENGINEER THOMAS W. DAVIS STATE OF FLORIDA

Signature

11/15/00
Date

Professional Engineer No. 36777

COVOL TECHNOLOGIES, INC.™

Material Safety Data Sheet

Product Name: Synthetic Fuel Pellets

Manufacturer: Covol Technologies, Inc.
3280 North Frontage Road
Lehi, UT 84043

Emergency Telephone Number: 801-768-4481 / 1-800-316-6214
Information Telephone Number: 801-768-4481

Date Prepared: September 17, 1998

1. Composition/Information on Ingredients
   A Component:
   1. 85-99% Coal
   2. 1-15% H2O
   3. 0.1% Proprietary Carboxylated Styrene/Butadiere Polymer

2. Physical Qualities

Boiling Point	=	N/A
Specific Gravity (H2O) = 1	=	1.2 to 1.6
Vapor Pressure (mm Hg) 25 C	=	Negligible
Melting Point	=	> 350 C
Vapor Density (air = 1)	=	N/A
Evaporation Rate (Bu ACC = 1)	=	N/A
Solubility in Water	=	Negligible
Appearance and Odor	=	Black or Brownish-Black Pellets, little or no odor.

3. Fire and Explosion Hazard

Flash Point (Method Used): None Reported

Flammable Limits: LEL: >0.05 oz/FT3 UEL: None Reported

Extinguishing Media: Nitrogen, carbon dioxide, steam, water or ammonium diphosphate powder.

Special Fire Fighting Procedures: Wear self-contained breathing apparatus and full protective gear when exposed to fire. Avoid creating dust.

Unusual Fire & Explosion Hazards: A fire hazard exists when exposed to heat or flame. Airborne coal dust is an explosion hazard.

4. Health Hazard & First Aid

Route(s) of Entry: **Inhalation**? Yes **Skin**? No **Ingestion**? No

Summary of Risks: Coal workers' pneumoconiosis is the occupational disease caused by prolonged retention of abnormal amounts of dusts in lungs. It can occur after years of excessive exposure to respirable coal dust in coal mining, handling, and processing. Respirable quartz particulate can be simultaneously present with the coal. There are two forms of coal workers' pneumoconiosis: simple and complicated (progressive massive fibrosis). Simple pneumoconiosis results from inhalation and retention of excessive airborne dust. Complicated pneumoconiosis develops in lungs already affected by simple pneumoconiosis. In many cases, coal workers' pneumoconiosis does not progress beyond the simple stage.

Target Organs: Lungs

Acute Effects: Symptoms of inhalation of excessive amounts of coal dust include coughing, wheezing, and shortness of breath.

Chronic Effects: Chronic bronchitis and emphysema are reported to result from excessive coal dust inhalation. Individuals having rheumatoid arthritis in conjunction with simple coal workers' pneumoconiosis may have rapidly developing lung damage (Caplan's Syndrome).

Medical Conditions Usually Aggravated by Exposure: Pulmonary disorders.

Heritage

5. Emergency and First Aid Procedures

Eyes: Gently lift the eyelids and flush continuously with water for 15 minutes. Consult a physician as needed.

Skin: For reddened or blistered skin, consult a physician. Wash affected area with soap and water.

Inhalation: Remove exposed person to fresh air. Seek medical attention if needed.

Ingestion: Never give anything by mouth to an unconscious or convulsing person. If ingested, have person drink 1 to 2 glasses of water, then induce vomiting repeatedly.

Carcinogenicity: N.T.P.? None KnownIARC monographs? None Known
OSHA Regulated? None Known

6. Reactivity

Stability: Stable

Conditions to Avoid: Coal can react slowly with oxygen at room temperature; heat can accelerate the process. Moderate, spontaneous heating may occur. Slightly explosive when exposed to flame.

Incompatibility: (Materials to avoid): Strong oxidizing agents.

Hazardous Decomposition or Byproducts: Oxides of carbon, nitrogen, sulfur, soot, fly ash, and partially oxidized hydrocarbons.

Hazardous Polymerization: Will Not Occur.

Conditions to Avoid: None.

7. Spill or Leak Procedures

Steps To Be Taken in Case Material is Released or Spilled: Notify safety personnel and remove all heat and ignition sources. Do not create any unnecessary airborne dust. Avoid inhalation. Use water mist to reduce dust. Provide ventilation, as appropriate. Use personal protection for respiratory, skin and eyes.

Waste Disposal Method: Follow applicable federal, state and local regulations.

8. Protection Information

Respiratory Protection: NIOSH certified particulate respirator for pneumoconiosis producing dust.

Ventilation:

Local Exhaust - To Control Dust. Special - None
Mechanical (Gen) - To Control Dust. Other - None

Protective Gloves: Impervious Gloves.

Eye Protection: Eye glasses with side shields or goggles.

Other Protective Clothing or Equipment: Industrial hygiene survey of exposures would provide data needed to determine other precautions.

Work/Hygienic Practices: Avoid eating, drinking and smoking in work areas. Practice good personal hygiene after using this material.

9. Disclaimer

While the information contained herein was derived from sources believed to be reliable, Covol neither expressly nor impliedly warrants the information as accurate and complete and assumes no responsibility for same. The data is provided solely for your consideration & investigation.

10. Storage and Handling

Precautions to be Taken in Handling and Storing: Keep sources of heat and ignition, flammable materials and strong oxidizing agents away from areas where coal dust may collect. Prevent static spark.

Other Precautions: Certain conditions could create overexposure to coal dust or to trace elements. These activities should be evaluated for compliance with applicable materials.

11. Transportation

Transportation Data:	(49 CFR 172.10)
DOT Shipping Name:	Coal ground bituminous, see coal, or coal facings.
DOT Hazard Class:	Flammable Solid.
ID No.	NA 1381
DOT Label:	Flammable Solid
DOT Packaging Exceptions:	173.165
DOT Packaging Requirements:	173.165

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

24-HOUR EMERGENCY PHONE NUMBER: 517-636-4400

Product: LATEX DL 298NA

Product Code: 61584

Effective Date: 01/07/99 Date Printed: 04/25/00 MSD: 005213

The Dow Chemical Company, Midland, MI 48674

Customer Information Center: 800-258-2436

2. COMPOSITION/INFORMATION ON INGREDIENTS

Proprietary carboxylated styrene/ butadiene polymer		40-62%
Water	CAS# 007732-18-5	38-60%

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

****
* Milky white liquid emulsion. Slight odor. No significant immediate *
* hazards for emergency response are known. Dike and contain spills. *
* Avoid dilution of spills. *
****

POTENTIAL HEALTH EFFECTS (See Section 11 for toxicological data.)

EYE: May cause slight transient (temporary) eye irritation. Corneal injury is unlikely.

SKIN: Short single exposure not likely to cause significant skin irritation. Prolonged or repeated exposure may cause slight skin irritation. Material may stick to skin causing irritation upon removal. A single prolonged exposure is not likely to result in the material being absorbed through the skin in harmful amounts.

INGESTION: Single dose oral toxicity is considered to be extremely low. No hazards anticipated from swallowing small amounts incidental to normal handling operations.

INHALATION: Single exposure to vapors is not likely to be hazardous.

SYSTEMIC & OTHER EFFECTS: No relevant information found.

CANCER INFORMATION: No relevant information found.

(Continued on Page 2)
* or (R) Indicates a Trademark of The Dow Chemical Company

---

3. HAZARDS IDENTIFICATION (CONTINUED)

TERATOLOGY (BIRTH DEFECTS): No relevant information found.

REPRODUCTIVE EFFECTS: No relevant information found.

4. FIRST AID

EYES: Flush eyes with plenty of water.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, seek medical attention. Do not induce vomiting unless directed to do so by medical personnel.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES:
FLASH POINT: Not applicable
METHOD USED: Not applicable
AUTOIGNITION TEMPERATURE: Not applicable

FLAMMABILITY LIMITS:
LFL: Not applicable
UFL: Not applicable

HAZARDOUS COMBUSTION PRODUCTS: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Hazardous combustion products may include and are not limited to hydrocarbons, carbon monoxide and dense smoke.

OTHER FLAMMABILITY INFORMATION: This material will not burn until the water has evaporated. Residue can burn.

EXTINGUISHING MEDIA: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

FIRE FIGHTING INSTRUCTIONS: Keep people away. Isolate fire area

(Continued on Page 3)
* or (R) Indicates a Trademark of The Dow Chemical Company

---

5. FIRE FIGHTING MEASURES (CONTINUED)

and deny unnecessary entry. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

PROTECTIVE EQUIPMENT FOR FIRE-FIGHTERS: Wear positive-pressure, self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, pants, boots, and gloves). If protective equipment is not available or not used, fight fire from a protected location or safe distance.

6. ACCIDENTAL RELEASE MEASURES (See Section 15 for Regulatory Information)

PROTECT PEOPLE: Avoid contact with eyes and skin.

PROTECT THE ENVIRONMENT: Contain material to prevent contamination of soil, surface water or ground water.

CLEANUP: Recover and recycle spilled latex if possible, otherwise collect with absorbent material and transfer to appropriate containers for disposal. Water may be used for final cleaning of affected area.

7. HANDLING AND STORAGE

HANDLING: Practice reasonable care to avoid repeated, prolonged skin contact. Addition of chemicals may cause coagulation.

STORAGE: Store at temperatures between 40F and 110F. May coagulate if frozen at 32F, 0C. Material may develop bacteria odor on long-term storage. No safety problems known.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION: Use safety glasses.

SKIN PROTECTION: Wear clean, long-sleeved, body-covering clothing. Use gloves impervious to this material.

(Continued on Page 4)
* or (R) Indicates a Trademark of The Dow Chemical Company

Product Name: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 04/25/00 MSD: 005213

---

8. EXPOSURE CONTROLS/PERSONAL PROTECTION (CONTINUED)

RESPIRATORY PROTECTION: No respiratory protection should be needed.

EXPOSURE GUIDELINE(S): None established.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Milky white liquid emulsion.
ODOR: Slight odor.
VAPOR PRESSURE: 17.5 mmHg @ 20C
VAPOR DENSITY: 0.624 @ 80F
BOILING POINT: 212F, 100C
SOLUBILITY IN WATER: Latex as sold is dilutable. Polymer component is insoluble.
SPECIFIC GRAVITY: .980 - 1.040

The physical data listed are for a series of latexes. For specific properties on any given latex, see the product bulletin.

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under recommended storage conditions. See storage section.

CONDITIONS TO AVOID: Active ingredient decomposes at elevated temperatures. Product can decompose at elevated temperatures.

INCOMPATIBILITY WITH OTHER MATERIALS: None known.

HAZARDOUS DECOMPOSITION PRODUCTS: Hazardous decomposition products depend upon temperature, air supply and the presence of other materials.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL INFORMATION (See Section 3 for Potential Health Effects. For detailed toxicological data, write or call the address or non-emergency number shown in Section 1)

SKIN: The dermal LD50 has not been determined.

INGESTION: The oral LD50 for rats is > 5000mg/kg for similar materials.

MUTAGENICITY: No relevant information found.

(Continued on Page 5)
* or (R) Indicates a Trademark of The Dow Chemical Company

Product Name: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 04/25/00 MSD: 005213

---

12. ECOLOGICAL INFORMATION (For detailed Ecological data, write or call the address or non-emergency number shown in Section 1)

ENVIRONMENTAL FATE

MOVEMENT & PARTITIONING: No bioconcentration of the polymeric component is expected because of its high molecular weight. Latex dispersions will color water a milky white.

DEGRADATION & TRANSFORMATION: The polymeric component is not expected to biodegrade.

ECOTOXICOLOGY: Material is practically non-toxic to aquatic organisms on an acute basis (LC50 greater than 100 mg/L in most sensitive species).

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

DISPOSAL METHOD: DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal methods must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator.

THE DOW CHEMICAL COMPANY HAS NO CONTROL OVER THE MANAGEMENT PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN SECTION 2 (Composition/Information On Ingredients).

FOR UNUSED OR UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted recycler, reclaimer, incinerator or other thermal destruction device.

As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Center at 800-258-2436 or 517-832-1556 for further details.

14. TRANSPORT INFORMATION

CANADIAN TDG INFORMATION:
For TDG regulatory information, if required, consult transportation regulations, product shipping papers, or your Dow representative.

(Continued on Page 6)
* or (R) Indicates a Trademark of The Dow Chemical Company

Product Name: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 04/25/00 MSD: 005213

---

14. TRANSPORT INFORMATION (CONTINUED)

U. S. DEPARTMENT OF TRANSPORTATION (D.O.T.):
This product is not regulated by DOT when shipped domestically by land.

15. REGULATORY INFORMATION (Not meant to be all-inclusive--selected regulations represented)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See other sections for health and safety information.

U.S. REGULATIONS
==========

SARA 313 INFORMATION: To the best of our knowledge, this product contains no chemical subject to SARA Title III Section 313 supplier notification requirements.

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

Not to have met any hazard category

CANADIAN REGULATIONS
==========

WHMIS INFORMATION: The Canadian Workplace Hazardous Materials Information System (WHMIS) Classification for this product is:

This product is not a "Controlled Product" under WHMIS.

(Continued on Page 7)
* or (R) Indicates a Trademark of The Dow Chemical Company

Product Name: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 04/25/00 MSD: 005213

REGULATORY INFORMATION: (CONTINUED)

16. OTHER INFORMATION

MSDS STATUS: Revised Section 13

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Chair
2.
3.
4.
5.

PLEASE PREPARE REPLY FOR:

____ SECRETARY'S SIGNATURE
____ DIV/DIST DIR SIGNATURE
____ MY SIGNATURE
____ YOUR SIGNATURE
____ DUE DATE _____

ACTION/DISPOSITION

____ DISCUSS WITH ME
____ COMMENTS/ADVISE
____ REVIEW AND RETURN
____ SET UP MEETING
____ FOR YOUR INFORMATION
____ HANDLE APPROPRIATELY
____ INITIAL AND FORWARD
____ SHARE WITH STAFF
____ FOR YOUR FILES

COMMENTS:

Heal is another request for using a latex dust suppressant. This one is worded slightly differently because one of people from S.E.C. implied that the latex was to be used as a glue to make pellets. This turned out to be incorrect, but I felt it best to be clear we are only agreeing to a dust suppressant.

FROM: Jonathan DATE: 11/20/00 PHONE:

DEP 15-026 (12/93)

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

RECEIVED
SEP 14 1998
BUREAU OF
AIR REGULATION

September 14, 1998

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Seminole Electric Cooperative, Inc.
Revised DRAFT Title V Permit No. 1070025-001-AV

Dear Mr. Sheplak:

On behalf of Seminole Electric Cooperative, Inc. (Seminole), attached are comments on the Revised Draft Title V permit for the Seminole Power Plant. Seminole appreciates the Department's cooperation and attention thus far in processing this Title V permit, and looks forward to continuing to process this permit as expeditiously as possible. In this regard, Seminole has requested an Extension of Time until September 30, 1998 to resolve the issues contained herein. If this does not provide sufficient time, Seminole intends to request an additional extension request.

Also, Seminole published the Intent to Issue the Revised Draft Title V permit in the Palatka Daily News on September 4, 1998. We will forward a copy of the proof of publication as soon as we receive it.

After you have reviewed these comments, please contact me at your earliest convenience at (813)963-0994.

Sincerely,

Robert Manning

for/ Mike Roddy
Environmental Engineer

16313 NORTH DALE MABRY HIGHWAY • P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994

cc: Mike Opalinski
Clair Fancy, P.E., DEP
Ed Svec, DEP
Tom Davis, P.E., ECT
Robert Manning, HGSS

9/14/98 cc: Scott Sheplak

SEMINOLE ELECTRIC COOPERATIVE
COMMENTS ON REVISED DRAFT TITLE V PERMIT
SEMINOLE POWER PLANT

Section I., Facility Information, Subsection B.

1. Seminole included the following activities in its list of exempt/insignificant activities in its Title V application, and therefore certified that they meet the criteria under Rule 62-213.430(6), F.A.C. These activities are also exempt pursuant to Rule 62-210.300(3)(a)20., F.A.C., and Rule 62-210.300(3)(a)21., F.A.C. Accordingly, Seminole requests the deletion of the following two activities listed as Unregulated Emission Units and/or Activities.

~~-xxx---One or more emergency generators not subject to the Acid Rain Program--~~
~~-xxx---One or more heating units and general purpose internal combustion engines not subject to the Acid Rain Program~~

Section II., Facility-wide Conditions.

1. Condition 8. Seminole appreciates the Department's response to our comments on the initial Draft Title V permit, specifically the Department's acknowledging that the reasonable precautions "will be employed as necessary."

Section III. Subsection A.

1. Condition A.3. For clarification, Seminole requests the following revisions to this condition to ensure that the limitations are applied on a per-unit basis: "The only fuels allowed to be fired in each unit are coal . . . . The maximum weight of petroleum coke burned in each unit shall not exceed . . . Also the regulatory citation for this condition should either be deleted or include a specific citation to Rule 62-213.410(1), F.A.C.

2. Conditions A.5. and A.6. Seminole requests the combination of these two Conditions as follows to clarify that the 0.03 lb/MMBtu PM limit applies to all solid and liquid fuels (i.e., coal, coal and petroleum coke blends, No. 2 fuel oil, and on-specification used oil). Compliance provisions are addressed separately in Condition A.24 and therefore need not be repeated in Condition A.5.

> Particulate Matter (All Solid and Liquid Fuels). No owner or operator shall cause to be discharged into the atmosphere when combusting solid and/or liquid fuels ~~a coal and petroleum coke blend~~ any gases which contain particulate matter in excess of 13 ng/J (0.03 lb/million Btu) heat input, and one percent of the potential combustion concentration (99 percent reduction) when combusting solid fuels, and 30 percent of the potential combustion concentration (70 percent reduction) when combusting liquid fuels. [40 CFR 60.42a(a) and PSD-FL-018(A)]

3. Condition A.8. Seminole requests the following revision to Condition A.8.(1) to add the NSPS Subpart Da SO_2 90 percent reduction requirement for coal firing. Condition A.8.(3) emission limits only apply to liquid or gaseous fuel combustion per 40 CFR 60.43a(b) and therefore should be deleted from Condition A.8. which addresses SO_2 emission limits for coal only.

> (1) 520 ng/J (1.20 lb/million Btu) heat input and 10 percent of the potential combustion concentration (90 percent reduction), or

4. Condition A.9. Seminole requests the following revision to Condition A.9.(1) adds the NSPS Subpart Da SO_2 90 percent reduction requirement for liquid fuel combustion:

> (1) 340 ng/J (0.80 lb/million Btu) heat input and 10 percent of the potential combustion concentration (90 percent reduction), or

5. Condition A.10. This condition has been superseded by NSPS Subpart Da requirements and therefore is obsolete and should be deleted.

6. Condition A.15 and A.17. Seminole requests the following revisions to clarify the NSPS Subpart Da requirements and combine Conditions A.15 and A.17. Compliance provisions are addressed separately in Condition A.25 and therefore need not be repeated in Condition A.15.

> 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 nitrogen oxides in excess of the following emission limits, ~~based on a 30-day rolling average.~~
>
> (1) NO_x emissions limits:
>
> > (a) ~~Bituminous coal emission limit for heat input:~~ 260 ng/J (0.60 lb/million Btu) heat input determined on a 30-day rolling average when combusting bituminous coal or bituminous coal and petroleum coke blends;
> >
> > (b) ~~All other liquid fuels emission limit for heat input:~~ 130 ng/J (0.30 lb/million Btu) heat input determined on a 30-day rolling average when combusting liquid fuels, and
> >
> > (c) 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.
>
> (2) NO_x reduction requirement. Solid fuels: 65 percent reduction of potential combustion concentration; Liquid fuels: 30 percent reduction of potential combustion concentration. [40 CFR 60.44a(a)(1) & (2) and PSD-FL-018(A)]

7. Condition A.19. This Condition should be deleted because it is not included in the PSD Final Determination.

8. Condition A.21 and A.22. These Conditions should be deleted because these units are subject to NSPS or NSPS-derived limits and are therefore only subject to the NSPS excess emission provisions; the state excess emission provisions do not apply. It is not appropriate to subject a unit that must comply with an NSPS or NSPS-derived limit, which was established by taking into account the NSPS excess emission provisions, to a more stringent state developed excess emission provision. Moreover, in DEP's June 12, 1998 response to an FCG comment letter, DEP stated that the excess emissions provisions under Rule 62-210.700, F.A.C. do not apply to NSPS emission limits.

9. Condition A.50. Seminole requests the following amendments to this Condition: (i) Condition A.50.(a)1. should be deleted. Units 1 and 2 are subject to annual compliance testing for PM. Sampling time for PM testing is specified in Condition A.42.(2)(i). Having two conditions which address the same issue is redundant and potentially confusing.

(ii) Condition A.50.(a)2.a. is not applicable because Units 1 and 2 or not batch, cyclical processes or operations which are normally completed within less than the minimum observation period.

(iii) Condition A.50.(a)2.c. addresses requirements pertinent to FDEP employees or their agents and therefore should not be included in the Title V permit; i.e., the requirements do not apply to Seminole.

(iv) Condition A.50.(b) should be deleted. Units 1 and 2 are subject to annual compliance testing for PM. Sampling volume for PM testing is specified in Condition A.42.(2)(i). Having two conditions which address the same issue is redundant and potentially confusing.

10. Condition A.52. Because Condition A.52(a) is a specific condition that only applies to Units 1 and 2, the requested condition revisions state only the specific requirements for these emission units; i.e., eliminates generic language. The requested revisions to Condition A.52.(a)(4) clarify that annual testing is only required for PM. Because compliance with the remaining regulated pollutants for Units 1 and 2 (i.e., SO_2, NO_x, and visible emissions) are determined continuously using CEMS, performing an annual compliance test for these two pollutants is not necessary. The SO_2 and NO_x CEMS are operated, maintained, and certified pursuant to 40 CFR Part 75 requirements, including an annual Relative Accuracy Test Audit (RATA) using EPA reference methods.

The following provisions apply only to Units 1 and 2. ~~emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) General Compliance Testing.

~~2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted~~

~~annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.~~

~~3.~~1. ~~a~~ A compliance test that demonstrates compliance with the applicable particulate matter and visible emission limiting standards specified in Condition A.5. and Condition A.7. shall be submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~The most recent annual compliance test may be submitted to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for Units 1 and 2 if the units ~~any emissions unit that~~, during the year prior to renewal:
a. Did not operate; or
b. ~~In the case of a fuel burning emissions unit, b~~Burned liquid and/or solid fuel for a total of no more than 400 hours.

~~4.~~2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. ~~Visible emissions, if there is an applicable standard;~~ and
b. Particulate Matter. ~~Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and~~
~~c. Each NESHAP pollutant, if there is an applicable emission standard.~~

~~5.~~3. An annual compliance test for particulate matter or visible emissions shall not be required ~~for~~ if a unit ~~the any fuel burning emissions unit that~~, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

~~9.~~4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

Section III. Subsection B. Railcar Maintenance Facility

1. Condition B.9. Seminole requests the following revisions because Condition B.9 is a specific condition that only applies to the railcar maintenance emission unit. The requested revisions state only the specific requirements for this emission unit; i.e., eliminates generic language.

The following provisions apply only to the railcar maintenance emission unit. ~~those emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) ~~General~~ Compliance Testing.

~~3.~~1. ~~The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a~~ A compliance test that demonstrates compliance with the ~~applicable~~ visible emission limiting standard specified in Condition B.3. shall be conducted and submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~ The most recent annual compliance test may be submitted to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results if the railcar maintenance emission unit did not operate ~~for any emissions unit that,~~ during the year prior to renewal ~~a. did not operate~~;

~~4.~~2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, ~~the owner or operator of each emissions unit shall have~~ a formal compliance test shall be conducted for~~:--a.~~ visible emissions~~.--if there is an applicable standard~~;

~~9.~~3. ~~The owner or operator shall notify --t~~The Department shall be notified, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

2. Condition B.11. Seminole requests the following revisions state the specific VE test reporting requirements applicable to the railcar maintenance emission unit.

~~(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.--~~
~~(b) -----The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.~~

The results of each visible emission compliance test shall be filed with the Department in a test report as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8), F.A.C.]

Section III. Subsection D - Limestone and FGD Sludge Handling and Storage System

1. Condition D.10. Seminole requests the following revisions to state the specific VE test reporting requirements applicable to the limestone and FGD sludge handling and storage emission unit:

Test Reports.
~~(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.~~
~~(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.~~
The results of each visible emission compliance test shall be filed with the Department in a test report as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8), F.A.C.]

Section IV. Acid Rain Part

1. Condition A.4. This Condition applies to all of the Conditions in this Title V Permit, and not just the Acid Rain Conditions, and therefore this Condition should be moved to the facility wide section of this Permit.

2. It is unclear that the early election NO_x requirements will apply after this permit becomes effective. The Conditions which state that the compliance plan applies from 2000 to 2007 is contained in the Phase I part of the permit, which states that it governs the units until December 31, 1999. Perhaps the NO_x requirements should be included in the Phase II part of the permit as well.

Appendix U-1, List of Unregulated Emission Units and/or Activities

1. Transfer deleted activities to Appendix E-1:

~~-xxx- One or more emergency generators not subject to the Acid Rain Program~~
~~-xxx- One or more heating units and general purpose internal combustion engines not subject to the Acid Rain Program~~

The listed activities (emergency generators and heating units and general purpose internal combustion engines) were certified in the Title V application to meet the criteria of Rule 62-213.430(6), F.A.C., and are exempt pursuant to Rules 62-210.300(3)(a)20., F.A.C. and Rule 62-210.300(3)(a)21., F.A.C.

APPENDIX E-1, List of Exempt Emission Units and/or Activities

1. Add Items 16. through and 18. as follows:

16. One or more emergency generators which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. One or more heating units and general purpose internal combustion engines which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.

The additional activities listed above were included in the Title V application and are specifically exempt pursuant to Rules 62-210.300(3)(a)20., 21., 24., and 26., F.A.C.

Table 1-1, Summary of Air Pollutant Standards and Terms

1. Page 1 of 4. The heading to the Table under Allowable Emissions should include the parenthetical (per unit). Also, the standard for SO_2, for coal and petcoke blend, should include a footnote to include the formula in Condition A.13. Also, the listed standards for SO_2, for coal and petcoke, should contain a notation that they are for petcoke only and the correct standard for coal for Units 1 and 2 is 1.2 pounds per MMBtu.

Table 2-1, Summary of Compliance Requirements

1. Page 1 of 4. In accordance with the authority for Seminole to utilize either CMS or Method 9 for the compliance method for VE, the testing time frequency should be revised. For SO_2 and NO_x, the annual testing time frequency and one hour minimum compliance test duration notation should also be deleted. Finally, the testing for CO and H2SO4 should contain a footnote which states that this testing frequency only applies for 5 years from the initiation of petcoke firing, in accordance with Conditions A.69 and A.70.

Periodic Monitoring

1. For SO_2, NO_x, and opacity, Seminole requests the inclusion of the following sentence in the Statement of Basis for the permit (Seminole requests that this language not be included as a condition in the permit):

"For purposes of periodic monitoring for the pollutants SO_2, NO_x, and opacity, the permittee will utilize continuous emission monitors, which are otherwise required by the Acid Rain program and/or 40 CFR Part 60."

2. For particulate matter, Seminole is researching what degree of monitoring should be considered sufficient, based on historical compliance data. Seminole will forward its proposal regarding particulate matter as soon as our research is completed.

ORIGINAL: CLAIR
xc: HLR
1/18

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4APT-ARB

Jobwell doe Ed! Smith

RECEIVED
JAN 18 2000
DIVISION OF AIR
RESOURCES MANAGEMENT

JAN 7 2000

Howard L. Rhodes, Director
Department of Environmental Protection
Division of Air Resources Management
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Objection to Proposed Title V Permit for
Seminole Electric Cooperative - Seminole Power Plant
Permit Number 1070025-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed changes to the Seminole Electric Cooperative - Seminole Power proposed title V permit, dated December 17, 1999 and December 29, 1999, which was the subject of a U.S. Environmental Protection Agency (EPA) title V objection on October 15, 1999. EPA Region 4 has completed its review of the proposed changes to the permit and believes that the State has adequately addressed each of the issues enumerated in the objection. Therefore, EPA considers the objection to be resolved. Once the state's proposed changes and the changes below are incorporated into the permit, the State may proceed with permit issuance. Please note, however, that our opportunity for review and comment on this permit does not prevent EPA from taking enforcement action for issues that were not raised during permit review. After final issuance, this permit may be reopened if EPA or the permitting authority later determines that it must be revised or revoked to assure compliance with applicable requirements.

We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Sincerely,

James D. Kutchan for

Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division

cc: Mr. James R. Duren
Seminole Electric Cooperative

1/19/00 cc: Ed Svec

Barbara \ File

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

December 29, 1999

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to Satisfy EPA Objections
Seminole Electric Cooperative, Seminole Power Plant, PROPOSED Title V Permit 1070025-001-AV

Dear Mr. Neeley:

This letter is to document additional changes that the Department proposes to satisfy EPA Region 4 objections to Florida's PROPOSED Title V permit 1070025-001-AV for Seminole Electric Cooperative, Seminole Power Plant. These objections were detailed in a letter from EPA Region 4 dated October 15, 1999. in which EPA indicated the primary basis for objection was that the permit does not fully meet periodic monitoring requirements of 40 CFR 70.6(a)(3)(i) and does not address all operational requirements and limitations to ensure compliance with the applicable requirements of 40 CFR 70.6(a)(1). The remaining issues addressed in this letter are EPA Objection Issues 3, 5, and 8. Telephone conversations with Ms. Gracy Danois of EPA Region 4 indicate the other issues were satisfactorily addressed in our response dated December 17, 1999.

The changes proposed in this letter result primarily from a letter from Mr. Mike Opalinski, the Director of Environmental Affairs for Seminole Electric Cooperative, and the past resolution to similar objections the EPA found acceptable. Hopefully these changes will allow Florida to issue the FINAL Title V permit for this plant. Please review the following proposed changes to the referenced permits. If you concur with our changes, we will issue the FINAL Title V permit with these changes.

I. EPA Objection Issues

3. Appropriate-Averaging Times - The particulate matter emission limits in condition A.5., the volatile organic compound (VOC) emissions limits in condition B.4., and the visible emissions limits in conditions B.6., C.4., and D.4., do not contain averaging times. Because of the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a general condition in the, permit stating that the averaging time for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance. If a specific averaging time is selected for the particulate matter emission limit in condition A.5., Region 4 recommends that a six-hour averaging time be used to be consistent with the requirements of permit condition A.40.

PERMITTEE RESPONSE: EPA is requesting an averaging time for the PM limit for the boiler, the VOC limit for the railcar maintenance unit, and the VE limits for the railcar maintenance unit, coal yard, limestone and FGD sludge handling and storage emissions units in order to make the limits "practicably enforceable." Seminole does not agree with EPA's comment. However, in order to move this process forward, Seminole does not intend to object to the inclusion of separate "permitting notes" following Conditions A.5., B.6., C.4. and D.4. which state that "the averaging time for this condition is based on the run time of the specified test method." This note is acceptable with the understanding that if a different test method (i.e., compliance demonstration method) is imposed in the future, Seminole will have the right to negotiate a different averaging time. For the VOC limit at the railcar maintenance unit in Condition B.4., no permitting note should be included because the compliance determination method is recordkeeping, not a specific performance test.

PROPOSED CHANGE: The following will be added after Specific Conditions A.5., B.6., and C.4.:

Add: {Permitting note: The averaging time for this condition is based on the run time of the specified test method.}

The following will be added after Specific Condition D.4.:

Add: {Permitting note: The averaging time for this condition is based on the application time of the coating being applied.}

5. Periodic Monitoring: Condition A-50. of the permit requires the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency is justified by the low emission rate documented in previous emissions tests while firing coal and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in condition A.50. use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility is required to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedence of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedence of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

PERMITTEE RESPONSE: EPA is requesting additional periodic monitoring for the PM limit because this unit utilizes an ESP. Seminole disagrees with EPA's comment and believes that the historical data already provided is sufficient. Moreover, the requirement that EPA is attempting to impose is essentially identical to the requirements of the Compliance Assurance Monitoring (CAM) rule, which provides a five-year (minimum) implementation period.

However, in order to move this process forward, Seminole proposes that a condition be added to require an additional steady state PM test whenever the COMS indicates an opacity equal to or above 20 percent, as follows:

"Whenever more than five percent of the COMS readings for any calendar quarter shows 20% or greater opacity (excluding periods of startup, shutdown and periods of COMS outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following calendar quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special compliance test shall be performed within 20 days."

PROPOSED CHANGE: The following Specific Condition will be added as follows:

> **Add: A.52.** Whenever more than five percent of the COMS readings for any calendar quarter shows 20% or greater opacity (excluding periods of startup, shutdown and periods of COMS outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following calendar quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special compliance test shall be performed within 20 days.

8. Periodic Monitoring - Conditions C.9. and D.9. of the permit require that annual Method 9 tests be conducted for the units listed in the permitting notes. For units with control equipment, this usually does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

PERMITTEE RESPONSE: EPA is requesting daily observations of the specified emission points at the coal yard and FGD sludge handling system. To resolve EPA's concern, Seminole suggests that the following language be added to the "permitting notes" following Conditions C.9. and D.9.:

"For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly. Differential pressure data will be collected and correlated to visible emissions. This data will be used to develop an action plan based on the differential pressure levels."

PROPOSED CHANGE: The Department agrees that a properly operating baghouse will ensure compliance with the visible emissions standard. The permitting notes following Conditions C.9. and D.9. are changed as follows:

From:

Condition C.9. {Permitting note: The individual coal handling and storage emission points requiring an annual VE test are those containing baghouse controls. These baghouse locations are emission points CH-002, CH-011, and CH-012a and b.}

Condition D.9. {Permitting note: The individual limestone and FGD sludge handling points requiring an annual VE test are those containing filter and wet scrubber equipment. These locations are emissions points L-001, FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, FGD-007 or FGD-008, and FGD-009 or FGD-010.}

To:

Condition C.9. {Permitting note: The individual coal handling and storage emission points requiring an annual VE test are those containing baghouse controls. These baghouse locations are emission points CH-002, CH-011, and CH-012a and b. For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly. Differential pressure data will be collected and correlated to visible emissions. This data will be used to develop an action plan based on the differential pressure levels. The facility will provide the Department the results of this study within 180 days of the issuance date of this permit.}

Condition D.9. {Permitting note: The individual limestone and FGD sludge handling points requiring an annual VE test are those containing filter and wet scrubber equipment. These locations are emissions points L-001, FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, FGD-007 or FGD-008, and FGD-009 or FGD-010 For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly. Differential pressure data will be collected and correlated to visible emissions. This data will be used to develop an action plan based on the differential pressure levels. The facility will provide the Department the results of this study within 180 days of the issuance date of this permit.}

As you know, the 90 day period ends January 12th. All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing final permits. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, or Mr. Edward J. Svec at 850/921-8985, if you need any additional information.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CF/es

Attachments

cc: Scott M. Sheplak
Pat Comer
Mike Opalinski, Seminole Electric Cooperative, Inc.
Mike Roddy, Seminole Electric Cooperative, Inc.

Barbara / File

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

December 17, 1999

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to Satisfy EPA Objections
Seminole Electric Cooperative, Seminole Power Plant, PROPOSED Title V Permit 1070025-001-AV

Dear Mr. Neeley:

This letter is to document changes that the Department proposes to satisfy EPA Region 4 objections to Florida's PROPOSED Title V permit 1070025-001-AV for Seminole Electric Cooperative, Seminole Power Plant. These objections were detailed in a letter from EPA Region 4 dated October 15, 1999, in which EPA indicated the primary basis for objection was that the permit does not fully meet periodic monitoring requirements of 40 CFR 70.6(a)(3)(i) and does not address all operational requirements and limitations to ensure compliance with the applicable requirements of 40 CFR 70.6(a)(1).

The changes proposed in this letter result primarily from a letter from Mr. Mike Opalinski, the Director of Environmental Affairs for Seminole Electric Cooperative, and the past resolution to similar objections the EPA found acceptable. Hopefully these changes will allow Florida to issue the FINAL Title V permit for this plant. Please review the following proposed changes to the referenced permits. If you concur with our changes, we will issue the FINAL Title V permit with these changes.

I. EPA Objection Issues

1. Applicable Requirements - As a result of comments 7.R. and 9.R., PSD based permit conditions A.10. and A.19. were removed from the title V permit. Since PSD permit conditions are considered to be applicable requirements for title V permits, it is unclear why these conditions were removed. Please provide the basis for removing these conditions from the permit, or replace them if they were removed in error.

PERMITTEE RESPONSE: The conditions that DEP deleted, based on Seminole's request, were from a prior iteration of Seminole's PSD permit, not the Final Determination. Accordingly, these conditions were appropriately deleted.

PROPOSED CHANGE: No change is proposed. The PROPOSED permit reflects the most current PSD requirements.

2. Practical Enforceability - Condition A.3. specifies that steam electric generating units #1 and #2 are permitted to fire coal, coal with a maximum of 30 percent petroleum coke (by weight), No- 2 fuel oil, and on-specification used oil. Additionally, the condition limits the rate of petroleum coke combustion to no more than 186,000 pounds per hour (averaged over 24 hours). However, the permit does not contain adequate record keeping to demonstrate compliance with the fuel combustion limits.

In order for an operational limit to be enforceable as a practical matter- there must be a method of establishing compliance with that limit. Condition A.65. requires the source to maintain documentation verifying that the coal and petroleum coke fuel blends that are combusted do not exceed the 30 percent maximum petroleum coke by weight limit, However, the permit does not contain a requirement for the source to record the daily rate of petroleum coke combustion. Therefore, the permit should include a requirement that the source keep daily records of the mass consumption rate of the petroleum coke that is burned in the electric generating units.

PERMITTEE RESPONSE: EPA is requesting additional recordkeeping to assure that the 186,000 lb/hr (averaged over 24 hours) petcoke usage limit per emissions unit is met. This limit was derived by multiplying the maximum blend rate of 70%/30% coal/petcoke with the maximum amount of fuel that each emissions unit is capable of burning. Therefore, as long as the amount of petcoke is less than 30% of the total amount of fuel used, it is technically impossible to exceed the 186,000 lb/hr (averaged over 24 hours) petcoke limit per unit. Moreover, to assure an adequate margin of compliance, the actual blend rate is typically much less than 30%. Accordingly, there is no need for additional recordkeeping.

PROPOSED CHANGE: Since the 186,000 lbs/hr (averaged over 24 hours) petcoke limit per unit is equivalent to the 30% petcoke by weight limit and the permit currently contains a requirement "verifying that the coal and petroleum coke fuel blends combusted in Units 1 and 2 have not exceeded the 30 percent maximum petroleum coke by weight limit shall be maintained" (Specific condition A.65.), the department feels adequate recordkeeping is in place. To clarify the recordkeeping requirement as it relates to petcoke, Specific Conditions A.3. and A.65. will be linked as follows:

From: A.3. Methods of Operation. Fuel(s). The only fuels allowed to be fired are coal, coal with a maximum of 30 percent petroleum coke (by weight), No. 2 fuel oil, and on-specification used oil. The maximum weight of petroleum coke burned shall not exceed 186,000 pounds per hour (averaged over 24 hours). On-specification used oil containing any quantifiable levels of PCBs can only be fired when the emissions unit is at normal operating temperatures.
[Rule 62-213.410(1), F.A.C.; 40 CFR 271.20(e)(3); and PSD-FL-018(A)]

To: A.3. Methods of Operation. Fuel(s). The only fuels allowed to be fired are coal, coal with a maximum of 30 percent petroleum coke (by weight), No. 2 fuel oil, and on-specification used oil. The maximum weight of petroleum coke burned shall not exceed 186,000 pounds per hour (averaged over 24 hours), **see Specific Condition A.65.** On-specification used oil containing any quantifiable levels of PCBs can only be fired when the emissions unit is at normal operating temperatures.
[Rule 62-213.410(1), F.A.C.; 40 CFR 271.20(e)(3); and PSD-FL-018(A)]

3. Appropriate-Averaging Times - The particulate matter emission limits in condition A.5., the volatile organic compound (VOC) emissions limits in condition B.4., and the visible emissions limits in conditions B.6., C.4., and D.4., do not contain averaging times. Because of the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a

general condition in the, permit stating that the averaging time for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance. If a specific averaging time is selected for the particulate matter emission limit in condition A.5., Region 4 recommends that a six-hour averaging time be used to be consistent with the requirements of permit condition A.40.

PERMITTEE RESPONSE: EPA is requesting an averaging time for the PM limit for the boiler, the VOC limit for the railcar maintenance unit, and the VE limits for the railcar maintenance unit, coal yard, limestone and FGD sludge handling and storage emissions units in order to make the limits "practicably enforceable." Seminole does not agree with EPA's comment. However, in order to move this process forward, Seminole does not intend to object to the inclusion of separate "permitting notes" following Conditions A.5., B.6., C.4. and D.4. which state that "the averaging time for this condition is based on the run time of the specified test method." This note is acceptable with the understanding that if a different test method (i.e., compliance demonstration method) is imposed in the future, Seminole will have the right to negotiate a different averaging time. For the VOC limit at the railcar maintenance unit in Condition B.4., no permitting note should be included because the compliance determination method is recordkeeping, not a specific performance test.

PROPOSED CHANGE: The following will be added after Specific Conditions A.5., B.6., C.4. and D.4.:

Add: {Permitting note: The averaging time for this condition is based on the run time of the specified test method.}

4. Excess Emissions - Condition A.19. includes the following permitting note: Once a written agreement between Seminole Electric Cooperative and the Northeast District office has been acquired approving a "Protocol for Startup and Shutdown", the protocol is automatically incorporated by reference and is a part of the permit.

EPA Region 4 believes that the "Protocol for Startup and Shutdown" should be subject to public and regulatory review, and processed as a permit modification. Please revise this permitting note to indicate that a permit modification will be required to incorporate this document once it has been approved by the District.

PERMITTEE RESPONSE: EPA is requesting a revision to the existing "permitting note" in Condition A.19. to clarify the requirements to incorporate a startup/shutdown protocol once it is approved by the District. To resolve EPA's concern, Seminole requests that the existing "permitting note" be deleted and a new condition inserted following Condition A.19. to allow for the operation of the emissions unit in accordance with the "Procedures for Startup and Shutdown" that Seminole included in its original Title V application. The application clarified that these Procedures are nonexclusive and are changed from time to time, as operating conditions dictate. Because this plan was part of the Title V application submitted in June of 1996, there should be no concerns regarding public notice. The requested condition could read as follows:

A.20. As necessary, the permittee will operate in accordance with the Procedures for Startup and Shutdown attached to this permit. The Procedures shall be used where applicable and where there is/are conflict with Condition A.19.

PROPOSED CHANGE: The Department will delete the permitting note following Specific Condition A.19. and replace it with a new Specific Condition as follows:

Delete: {Permitting note: Once a written agreement between Seminole Electric Cooperative and the Northeast District office has been acquired approving a "Protocol for Startup and Shutdown", the protocol is automatically incorporated by reference and is a part of the permit. The protocol shall be used where applicable and where there is/are conflict with the rule.}

Add: A.20. As necessary, the permittee will operate in accordance with the Procedures for Startup and Shutdown attached to this permit. The Procedures shall be used where applicable and where there is/are conflict with Condition A.19.

5. Periodic Monitoring: Condition A-50. of the permit requires the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency is justified by the low emission rate documented in previous emissions tests while firing coal and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in condition A.50. use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility is required to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedence of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedence of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

PERMITTEE RESPONSE: EPA is requesting additional periodic monitoring for the PM limit because this unit utilizes an ESP. Seminole disagrees with EPA's comment and believes that the historical data already provided is sufficient. Moreover, the requirement that EPA is attempting to impose is essentially identical to the requirements of the Compliance Assurance Monitoring (CAM) rule, which provides a five-year (minimum) implementation period.

However, in order to move this process forward, Seminole proposes that a "permitting note" be added to Condition A.50. to require an additional steady state PM test whenever the COMS indicates an opacity equal to or above 20 percent, as follows:

"Whenever more than five percent of the COMS readings for any calendar quarter shows 20% or greater opacity (excluding periods of startup, shutdown and periods of COMS outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following calendar quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special compliance test shall be performed within 20 days."

PROPOSED CHANGE: A permitting note will be added following Specific Condition A.50. as follows:

Add: {Permitting note: Whenever more than five percent of the COMS readings for any calendar quarter shows 20% or greater opacity (excluding periods of startup, shutdown and periods of COMS outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following calendar quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special compliance test shall be performed within 20 days.}

6. Periodic Monitoring - Condition B.4. specifies that volatile organic compound emissions shall not exceed 11.84 tons per year. Based on the short-term limit for this unit (38.75 pounds per hour) and 8,760 hours of operation per year, unit 003 could emit 167.72 tons per year. Since this value exceeds the annual emission limit of 11.84 tons per year, the permit must be revised to ensure that the annual limit is not exceeded through restriction of operating, hours or by some other enforceable means.

PERMITTEE RESPONSE: EPA is requesting additional recordkeeping to assure compliance with the 11.84 tons per year VOC limit on the railcar maintenance unit. Based on the data submitted to DEP in Annual Operating Reports, the annual tons of VOC emitted for the past five years are as follows: 1994 - 7.6; 1995 – 4.14; 1996 – 4.62; 1997 – 2.32; and 1998 – 1.02. Therefore, the existing recordkeeping requirements (i.e., annual mass balance) provide sufficient assurance that Seminole is in compliance with the annual limit.

PROPOSED CHANGE: This emissions unit is a maintenance area where railcars owned by Seminole Electric are repainted. Numerous types of coatings with various VOC contents, some coatings do not contain VOC, are used. When this emissions unit was permitted, the coating with the maximum VOC content would result in an emissions rate of 38.75 pounds of VOC per hour, other coatings would have emissions far less than this value. Seminole Electric also requested that the hours of operation not be restricted. Seminole Electric estimated that the annual emissions of VOC would never exceed 11.84 tons per year. Since the time this emissions unit was permitted, the coatings industry has developed products for this application with VOC contents where Seminole's actual total annual VOC emissions have decreased from 7.6 tons per year in 1994 to 1.02 tons per year in 1998. Proper recordkeeping will ensure compliance with the annual limit (see the response to objection issue 7., below.) Therefore, no change is required.

7. Practical Enforceability - The record keeping requirements of condition B.10. are not specific, enough to adequately demonstrate compliance with the hourly VOC emission limit. In addition to recording the application rate of surface coatings, the source must also maintain records for the density and VOC content of each coating that is used. Additionally, the permit must specify a record keeping frequency that corresponds to the averaging time required under Objection Item 3. If the averaging time is short, the proposed mass balance methodology may not be accurate enough to ensure compliance with the pound per hour limit.

PERMITTEE RESPONSE: EPA is requesting additional recordkeeping to assure compliance with the pound per hour VOC limit on the railcar maintenance unit. Because of the physical limitations of this emissions unit, it is technically impossible for Seminole to exceed the pound per hour VOC limit. Facts justifying this conclusion include: (1) there is only physical space to paint one railcar at a time, (2) the maximum application capacity is limited to 50 gallons in a 3-hour period (i.e., approximately 16.7 gallons per hour), and (3) the drying time between coats limits the number of railcars that can be painted in an hour to 1.

PERMITTEE ADDITIONAL RESPONSE: This letter (dated December 14, 1999) is in response to EPA's objection number 7 concerning practical enforceability of the Railcar Maintenance Facility hourly VOC limit of 38.75 pounds per hour. Seminole believes that the painting process itself, as described in our previous response, is more than adequate to demonstrate compliance. However, in order to continue to move the process forward, Seminole will keep records of hourly quantities (gallons) of paint consumed during painting operations. These hourly records, combined with the pound per gallon VOC concentration contained in the product MSDS, will further verify compliance with the pound per hour VOC limit of 38.75.

PROPOSED CHANGE: Specific Condition B.10. will be changed as follows:

From: B.10. Record Keeping. The owner or operator shall record the application rate of all surface coatings, the total of all coatings applied and calculate the rate of volatile organic compound emissions through the use of materials balance. These records will be maintained for five years and will be made available to the Department upon request.
[Rule 62-213.400, F.A.C.]

To: B.10. Record Keeping. The owner or operator shall record the application rate of all surface coatings, the total of all coatings applied and calculate the rate of volatile organic compound emissions through the use of materials balance. Seminole will keep records of hourly quantities (gallons) of paint consumed during painting operations. These hourly records, combined with the pound per gallon VOC concentration contained in the product's MSDS will be utilized to determine the hourly emissions rate and the total annual emissions. These records will be maintained for five years and will be made available to the Department upon request.
[Rule 62-213.400, F.A.C.; and, Applicant Request of 12/14/99]

8. Periodic Monitoring - Conditions C.9. and D.9. of the permit require that annual Method 9 tests be conducted for the units listed in the permitting notes. For units with control equipment, this usually does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

PERMITTEE RESPONSE: EPA is requesting daily observations of the specified emission points at the coal yard and FGD sludge handling system. To resolve EPA's concern, Seminole suggests that the following language be added to the "permitting notes" following Conditions C.9. and D.9.:

"For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly."

PROPOSED CHANGE: The Department agrees that a properly operating baghouse will ensure compliance with the visible emissions standard. The permitting notes following Conditions C.9. and D.9. are changed as follows:

From:
Condition C.9. {Permitting note: The individual coal handling and storage emission points requiring an annual VE test are those containing baghouse controls. These baghouse locations are emission points CH-002, CH-011, and CH-012a and b.}

Condition D.9. {Permitting note: The individual limestone and FGD sludge handling points requiring an annual VE test are those containing filter and wet scrubber equipment. These locations are emissions points L-001, FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, FGD-007 or FGD-008, and FGD-009 or FGD-010.}

To:
Condition C.9. {Permitting note: The individual coal handling and storage emission points requiring an annual VE test are those containing baghouse controls. These baghouse locations are emission points CH-002, CH-011, and CH-012a and b. For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly.}

Condition D.9. {Permitting note: The individual limestone and FGD sludge handling points requiring an annual VE test are those containing filter and wet scrubber equipment. These locations are emissions points L-001, FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, FGD-007 or FGD-008, and FGD-009 or FGD-010. For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly.}

II. EPA General Comments

1. Compliance Certification - Facility-wide Condition 12. of the permit should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA.

PERMITTEE RESPONSE: Seminole does not object to the suggested change.

PROPOSED CHANGE: Facility-wide Condition 12. provides the address to which any report, certification (including the annual statement of compliance), request, etc., for the EPA is to be sent (Condition 11. does the same for DEP's district office). Facility-wide Condition 9. addresses the Annual Compliance Certification requirements and directs the reader to Condition 51. of Appendix TV-3, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii). Therefore, no change is required.

2. Excess Emissions - Conditions A.19. and A.20. address the occurrence of excess emissions from the electric generating units. More specifically, excess emission resulting from malfunction are permitted provided that best operational practices to minimize emission are adhered to and the duration of excess emissions are minimized. EPA has recently addressed the issue of excess emissions in a September 20, 1999, policy memorandum from Steven A. Herman, Assistant Administrator for Enforcement and Compliance Assurance, and Robert Periasepe, Assistant Administrator for Air and Radiation. The September 20, 1999, memo reaffirms and supplements the EPA's original policy regarding excess emissions during malfunction, startup, shutdown, and maintenance, which is contained in memoranda from Kathleen Bennett, formerly Assistant Administrator for Air, Noise and Radiation dated September 28, 1982, and February 15, 1983. The permit conditions that address excess emissions should be consistent with EPA's policy.

PERMITTEE RESPONSE: Florida's excess emissions rule, Rule 62-210.700, F.A.C., is part of the EPA-approved SIP and therefore must be included in the Title V permit.

PROPOSED CHANGE: Florida is charged to include all applicable requirements in Title V permits. EPA has objected when they believe applicable requirements were absent (see objection issue No.1 for this permit). The Excess Emissions Rule 62-210.700, F.A.C., is currently a part of an EPA approved SIP and is therefore, by definition, an applicable requirement. As such, it must be included in the permit. Florida understands that the EPA disagrees with some of the terms of this rule, as currently written. To resolve this comment on a prior permit, a permitting note, located in this permit prior to Specific Condition A.19., was crafted and included in all NSPS, NESHAP, or Acid Rain permits. The note states "The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS, NESHAP, or Acid Rain program provision." The Department believes that the permit is correctly written regarding this issue.

3. Minimum, Sampling Volume for Particulate Testing - Condition A.40. specifies a sample time and volume of at least 10 minutes and 60 dry standard cubic feet, respectfully, for particulate testing in accordance with 40 CFR 60.48a(b) and 40 CFR 60.11(b). Condition A.48 specifies a sample time from one to four hours and a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are inconsistent, a permitting note should be added to Condition A.48. to clarify the required sample time and volume or refer the permittee to Condition A.40.

PERMITTEE RESPONSE: Seminole does not object to inserting a reference to Condition A.40.

PROPOSED CHANGE: Condition A.48. is changed as follows:

From: (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

To: (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet. **See Specific Condition A.40.**

4. Frequency of Compliance Tests - Condition B.9. is unclear about whether compliance testing is required on an annual basis or just prior to renewal. Conditions C.9. and D.9. each contain permitting notes which clarify which units are to be tested annually, if any. A similar permitting note should be added for Condition B.9.

PERMITTEE RESPONSE: Condition B.9. requires an annual test for opacity for this unit pursuant to paragraph 4(a). Therefore, no changes are necessary.

PROPOSED CHANGE: Rule 62-297.310(7)(a)3., F.A.C., quoted in Specific Condition B.9., states an emissions unit is required to conduct an annual compliance test during the year prior to renewal of the permit. In addition, Rule 62-297.310(7)(a)4.a., F.A.C., quoted in Specific Condition B.9., states the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard, during each federal fiscal year. Therefore, because the emissions unit has an opacity standard, the emissions is required to conduct an annual compliance test and no further clarification is required.

5. Acid Rain The Phase II Acid Rain Application/Compliance Plan dated December 5, 1995, the Phase I Acid Rain permit dated March 27, 1997, and the Phase II NO_X Compliance Plan dated November 21, 1997, which

are referenced as attachments made part of the permit should also be referenced under Section IV, Subsection A.1.

PERMITTEE RESPONSE: Seminole does not object to the suggested change.

PROPOSED CHANGE: The Phase II Acid Rain Application/Compliance Plan dated December 5, 1995, is already referenced in Specific Condition A.1.a. The Phase I Acid Rain permit dated March 27, 19971, is already referenced in Specific Condition B.1.a. The Department will reference the Phase II NO_X Compliance Plan dated November 21, 1997, because the Phase II plan includes an Early Election Plan for NO_X, as follows:

From:
A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:
a. DEP Form No. 62-210.900(1)(a), dated December 5, 1995; and
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

B.1. The owners and operators of these Phase I acid rain unit(s) must comply with the standard requirements and special provisions set forth in the permit(s) listed below:
a. Phase I permit dated 03/27/97.
[Chapter 62-213, F.A.C.]

To:
A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:
a. DEP Form No. 62-210.900(1)(a), dated December 5, 1995; and
b. Phase II NO_X Compliance Plan dated 11/21/97. **See Specific Condition B.2.**
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

B.1. The owners and operators of these Phase I acid rain unit(s) must comply with the standard requirements and special provisions set forth in the permit(s) listed below:
a. Phase I permit dated 03/27/97; and
b. Phase II NO_X Compliance Plan dated 11/21/97.
[Chapter 62-213, F.A.C.]

6. Acid Rain - We recommend that a note be placed in Section IV, Subsection A, A.2., referencing the NO_X requirements indicated under Subsection B, B.2. This note should clarify that Florida DEP has approved and incorporated the NO_X Early Election requirements into the Phase II permit (part).

PERMITTEE RESPONSE: Seminole does not object to the suggested change.

PROPOSED CHANGE: Florida is required by statute to issue the Acid Rain part of the permit concurrently with the Title V permit. Since the facility elected into the Phase I Early Election Plans for NO_X, of the NO_X requirements are contained in Subsection B of the Acid Rain Part of the permit. In order to eliminate any confusion, Specific Condition A.2. will be changed as follows:

From: A.2. Sulfur dioxide (SO_2) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit is as follows:

To: A.2. Sulfur dioxide (SO_2) allowance allocations for each Acid Rain unit is as follows:

As you know, the 90 day period ends January 12th. All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing final permits. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, or Mr. Edward J. Svec at 850/921-8985, if you need any additional information.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CF/es

Attachments

cc: Scott M. Sheplak
Pat Comer
Mike Opalinski, Seminole Electric Cooperative, Inc.
Mike Roddy, Seminole Electric Cooperative, Inc.

Seminole Electric
COOPERATIVE, INC.
IN PARTNERSHIP WITH THOSE WE SERVE

RECEIVED
DEC 21 1999
BUREAU OF AIR REGULATION

December 14, 1999

Mr. Ed Svec
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Svec:

This letter is in response to EPA's objection number 7 concerning practical enforceability of the Railcar Maintenance Facility hourly VOC limit of 38.75 pounds per hour. Seminole believes that the painting process itself, as described in our previous response, is more than adequate to demonstrate compliance. However, in order to continue to move the process forward, Seminole will keep records of hourly quantities (gallons) of paint consumed during painting operations. These hourly records, combined with the pound per gallon VOC concentration contained in the product MSDS, will further verify compliance with the pound per hour VOC limit of 38.75.

Sincerely,

Mike Roddy
Senior Environmental Engineer

MR/lar

cc: M. Opalinski

HourlyVOC.wpd:General#20C

16313 North Dale Mabry Highway P.O. Box 272000 Tampa, Florida 33688-2000
Telephone 813.963.0994 Fax 813.264.7906 www.seminole-electric.com

Seminole Electric
COOPERATIVE, INC.
IN PARTNERSHIP WITH THOSE WE SERVE

RECEIVED
NOV 24 1999
BUREAU OF AIR REGULATION

November 22, 1999

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Re: Seminole Electric Cooperative, Inc.'s Palatka Power Plant
EPA Objection to Proposed Title V Permit No. 1070025-001-AV

Dear Mr. Sheplak:

Seminole Electric Cooperative, Inc. (Seminole) is in receipt of a letter from the U.S. EPA, Region IV, dated October 15, 1999, which objects to the issuance of the above-referenced Title V permit. EPA's basis for objection is that "the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. §70.6(a)(3)(i), and does not address all operational requirements and limitations to ensure compliance with all applicable requirements as specified under 40 C.F.R. §70.6(a)(1)." Following is Seminoles's response to EPA's letter.

I. **EPA Objections Issues**

(1) The conditions that DEP deleted, based on Seminole's request, were from a prior iteration of Seminole's PSD permit, not the Final Determination. Accordingly, these conditions were appropriately deleted.

(2) EPA is requesting additional recordkeeping to assure that the 186,000 lb/hour (averaged over 24 hours) petcoke usage limit per emissions unit is met. This limit was derived by multiplying the maximum blend rate of 70%/30% coal/petcoke with the maximum amount of fuel that each emissions unit is capable of burning. Therefore, as long as the amount of petcoke is less than 30% of the total amount of fuel used, it is technically impossible to exceed the 186,000 lb/hr (averaged over 24 hours) petcoke limit per unit. Moreover, to assure an adequate margin of compliance, the actual blend rate is typically much less than 30%. Accordingly, there is no need for additional recordkeeping.

(3) EPA is requesting an averaging time for the PM limit for the boiler, the VOC limit

16313 North Dale Mabry Highway P.O. Box 272000 Tampa, Florida 33688-2000
Telephone 813.963.0994 Fax 813.264.7906 www.seminole-electric.com

for the railcar maintenance unit, and the VE limits for the rail car maintenance unit, coal yard, limestone and FGD sludge handling and storage emission units in order to make the limits "practicably enforceable." Seminole does not agree with EPA's comment. However, in order to move this process forward, Seminole does not intend to object to the inclusion of separate "permitting notes" following Conditions A.5, B.6, C.4, and D.4 which state that "the averaging time for this condition is based on the run time of the specified test method." This note is acceptable with the understanding that if a different test method (i.e., compliance determination method) is imposed in the future, Seminole will have the right to negotiate a different averaging time at that time. For the VOC limit at the railcar maintenance unit in Condition B.4, no "permitting note" should be included because the compliance determination method is recordkeeping, not a specific performance test.

(4) EPA is requesting a revision to the existing "permitting note" in Condition A.19 to clarify the requirements to incorporate a startup/shutdown protocol once it is approved by the District. To resolve EPA's concern, Seminole requests that the existing "permitting note" be deleted and a new condition inserted following Condition A.19 to allow for the operation of the emissions unit in accordance with the "Procedures for Startup and Shutdown" that Seminole included in its original Title V application. The application clarified that these Procedures are nonexclusive and are changed from time to time, as operating conditions dictate. Because this Plan was part of the Title V application submitted in June of 1996, there should be no concerns regarding public notice. The requested condition could read as follows:

A.20. As necessary, the permittee will operate in accordance with the Procedures for Startup and Shutdown attached to this permit. The Procedures shall be used where applicable and where there is/are conflict with Condition A.19.

(5) EPA is requesting additional periodic monitoring for the PM limit because this unit utilizes an ESP. Seminole disagrees with EPA's comment and believes that the historical data already provided is sufficient. Moreover, the requirement that EPA is attempting to impose is essentially identical to the requirements of the Compliance Assurance Monitoring (CAM) rule, which provides a five-year (minimum) implementation period.

However, in order to move this process forward, Seminole proposes that a "permitting note" be added to Condition A.50 to require an additional steady state PM test whenever the COMS indicates an opacity equal to or above 20 percent, as follows:

"Whenever more than five percent of the COMS readings for any calendar quarter shows 20% or greater opacity (excluding periods of startup, shutdown and periods of COMS outages), a steady state particulate matter stack test shall be performed and

submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following calendar quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days."

(6) EPA is requesting additional recordkeeping to assure compliance with the 11.84 tons per year VOC limit on the railcar maintenance unit. Based on the data submitted to DEP in the Annual Operating Reports , the annual tons of VOC emitted for the past 5 years are as follows: 1994 - 7.6; 1995 - 4.14; 1996 - 4.62; 1997 - 2.32; and 1998 - 1.02. Therefore, the existing recordkeeping requirements (i.e., annual mass balance) provide sufficient assurance that Seminole is in compliance with the annual limit.

(7) EPA is requesting additional recordkeeping to assure compliance with the pound per hour VOC limit on the railcar maintenance unit. Because of the physical limitations of this emissions unit, it is technically impossible for Seminole to exceed the pound per hour VOC limit. Facts justifying this conclusion include: (1) there is only physical space to paint one railcar at a time, (2) the maximum application capacity is limited to 50 gallons in a 3-hour period (i.e., approximately 16.7 gallons per hour), and (3) the drying time between coats limits the number of railcars that can be painted in an hour to 1.

(8) EPA is requesting daily observations of the specified emission points at the coal yard and FGD sludge handling system. To resolve EPA's concern, Seminole suggests that the following language be added to the "permitting notes" following Conditions C.9 and D.9:

"For those emissions points specified herein containing a baghouse, the permittee shall maintain daily records of the differential pressure to assure that the baghouse is operating properly."

II. General Comments

1. Seminole does not object to the suggested change.

2. Florida's excess emissions rule, Rule 62-210.700, F.A.C., is part of the EPA-approved SIP and therefore must be included in the Title V permit.

3. Seminole does not object to inserting a reference to Condition A.40.

4. Condition B.9 requires an annual test for opacity for this unit pursuant to paragraph (a)4. Therefore, no changes are necessary.

5. Seminole does not object to the suggested change.

6. Seminole does not object to the suggested change.

Thank you for attention to this important matter. If you have any questions regarding Seminole's response or wish to discuss this matter further, please contact me as soon as possible at (813) 963-0994.

Sincerely,

M. P. Opalinski

Mike Opalinski
Director of Environmental Affairs

MPO/MR/vr

cc: Howard Rhodes, DEP
Clair Fancy, DEP
Ed Svec, DEP
Winston A. Smith, EPA
Elizabeth Bartlett, EPA
Robert Manning, HGSS

copy Ed
original to file
11/30/99 cc: Ed Svec

File/Barbara

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

October 28, 1999

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. James R. Duren
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, Florida 33618

Re: EPA Objection to PROPOSED Title V Permit No. 1070025-001-AV
Seminole Electric Cooperative, Inc. – Seminole Power Plant, Palatka, Florida

Dear Mr. Duren:

On October 15, the department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statues (F.S.), the department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection with 45 days after the date on which the department serves the applicant with a copy of the objection. {Day 45 = November 28}. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E. at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4) the department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit. {Day 90 = January 12}.

If you should have any other questions, please contact Mr. Scott M. Sheplak, P.E. at 850/921-9532.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/sms/k

Enclosures

cc: Thomas Davis, P.E., ECT, Inc.
Mike Roddy, Seminole Electric Cooperative, Inc.
Chris Kirts, P.E., FDEP, NED
Patricia Comer, Esquire, OGC w/enclosures
Douglas Neeley, USEPA w/o enclosures
Gregg Worley, USEPA w/o enclosures

P 265 657 768

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Mr. James R. Duren
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, FL 33618

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	10-28-99

PS Form **3800**, April 1995

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "*Return Receipt Requested*" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. James R. Duren
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, FL 33618

4a. Article Number
P 265 657 768

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
11-1

5. Received By: *(Print Name)*

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*
X Julissa Ordela

PS Form **3811**, December 1994 102595-97-B-0179 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Best Available Copy

fax received 10/15

CLAIR

Scott

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 15 1999

4APT-ARB

Howard L. Rhodes, Director
Department of Environmental Protection
Air Resources Management Division
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
OCT 21 1999
BUREAU OF AIR REGULATION

SUBJ: EPA's Review of Proposed Title V Permit
Seminole Electric Cooperative, Inc.
Seminole Power Plant, Palatka, Florida
Permit No. 1070025-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for the Seminole Power Plant, which was posted on DEP's web site on August 31, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), and does not address all operational requirements and limitations to ensure compliance with all applicable requirements as specified under 40 C.F.R. § 70.6(a)(1).

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Elizabeth Bartlett, Florida Title V Contact, at (404) 562-9122, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,

James D Kutzman for

Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

Enclosure

cc: Mr. James R. Duren, Seminole Electric Cooperative

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Seminole Electric Cooperative, Inc.
Seminole Power Plant
Permit no. 1070025-001-AV

I. EPA Objection Issues

1. Applicable Requirements - As a result of Comments 7.R and 9.R, PSD-based permit conditions A.10. and A.19. were removed from the title V permit. Since PSD permit conditions are considered to be applicable requirements for title V permits, it is unclear why these conditions were removed. Please provide the basis for removing these conditions from the permit, or replace them if they were removed in error.

2. Practical Enforceability - Condition A.3 specifies that steam electric generating units # 1 and # 2 are permitted to fire coal, coal with a maximum of 30 percent petroleum coke (by weight), No. 2 fuel oil, and on-specification used oil. Additionally, the condition limits the rate of petroleum coke combustion to no more than 186,000 pounds per hour (averaged over 24 hours). However, the permit does not contain adequate record keeping to demonstrate compliance with the fuel combustion limits.

   In order for an operational limit to be enforceable as a practical matter there must be a method of establishing compliance with that limit. Condition A.65 requires the source to maintain documentation verifying that the coal and petroleum coke fuel blends that are combusted do not exceed the 30 percent maximum petroleum coke by weight limit. However, the permit does not contain a requirement for the source to record the daily rate of petroleum coke combustion. Therefore, the permit should include a requirement that the source keep daily records of the mass consumption rate of the petroleum coke that is burned in the electric generating units.

3. Appropriate Averaging Times - The particulate matter emission limits in condition A.5, the volatile organic compound (VOC) emissions limit in condition B.4 , and the visible emissions limits in conditions B.6, C.4, and D.4, do not contain averaging times. Because the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a general condition in the permit stating that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance. If a specific averaging time is selected for the particulate matter emission limit in

condition A.5, Region 4 recommends that a six-hour averaging time be used to be consistent with the requirements of permit condition A.40.

4. Excess Emissions - Condition A.19 includes the following permitting note:

> *Once a written agreement between Seminole Electric Cooperative and the Northeast District office has been acquired approving a "Protocol for Startup and Shutdown", the protocol is automatically incorporated by reference and is a part of the permit.*

EPA Region 4 believes that the "Protocol for Startup and Shutdown" should be subject to public and regulatory review, and processed as a permit modification. Please revise this permitting note to indicate that a permit modification will be required to incorporate this document once it has been approved by the District.

5. Periodic Monitoring: Condition A.50 of the permit requires the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency is justified by the low emission rate documented in previous emissions tests while firing coal and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in condition A.50 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility is required to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time

when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

6. Periodic Monitoring - Condition B.4 specifies that volatile organic compound emissions shall not exceed 11.84 tons per year. Based on the short term limit for this unit (38.75 pounds per hour) and 8,760 hours of operation per year, unit 003 could emit 167.72 tons per year. Since this value exceeds the annual emission limit of 11.84 tons per year, the permit must be revised to ensure that the annual limit is not exceeded through restriction of operating hours or by some other enforceable means.

7. Practical Enforceability - The record keeping requirements of Condition B.10 are not specific enough to adequately demonstrate compliance with the hourly VOC emission limit. In addition to recording the application rate of surface coatings, the source must also maintain records for the density and VOC content of each coating that is used. Additionally, the permit must specify a record keeping frequency that corresponds to the averaging time required under Objection Item 3. If the averaging time is short, the proposed mass balance methodology may not be accurate enough to ensure compliance with the pound per hour limit.

8. Periodic Monitoring - Conditions C.9 and D.9 of the permit require that annual Method 9 tests be conducted for the units listed in the permitting notes. For units with control equipment, this usually does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

II. General Comments

1. Compliance Certification - Facility-wide Condition 12 of the permit should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA.

2. Excess Emissions - Conditions A.19 and A.20 address the occurrence of excess emissions from the electric generating units. More specifically, excess emission resulting from malfunction are permitted provided that best operational practices to minimize emission are adhered to and the duration of excess emissions are minimized. EPA has recently addressed the issue of excess emissions in a September 20, 1999, policy memorandum from Steven A. Herman, Assistant Administrator for Enforcement and Compliance Assurance, and Robert Perciasepe, Assistant Administrator for Air and Radiation. The September 20, 1999, memo reaffirms and supplements the EPA's original policy regarding excess emissions during malfunction, startup, shutdown, and maintenance, which is contained in memoranda from Kathleen Bennett, formerly Assistant Administrator for Air, Noise and Radiation dated September 28, 1982, and February 15, 1983. The permit conditions that address excess emissions should be consistent with EPA's policy.

3. Minimum Sample Volume for Particulate Testing - Condition A.40. specifies a sample time and volume of at least 120 minutes and 60 dry standard cubic feet, respectively, for particulate testing, in accordance with 40 CFR 60.48a(b) and 40 CFR 60.11(b). Condition A.48 specifies a sample time from one to four hours and a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are inconsistent, a permitting note should be added to Condition A.48. to clarify the required sample time and volume or refer the permittee to Condition A.40.

4. Frequency of Compliance Tests - Condition B.9 is unclear about whether compliance testing is required on an annual basis or just prior to renewal. Conditions C.9 and D.9 each contain permitting notes which clarify which units are to be tested annually, if any. A similar permitting note should be added for Condition B.9.

5. Acid Rain - The Phase II Acid Rain Application/Compliance Plan dated December 5, 1995, the Phase I Acid Rain permit dated March 27, 1997, and the Phase II NO_x Compliance Plan dated November 21, 1997, which are referenced as attachments made part of the permit should also be referenced under Section IV, Subsection A.1.

6. Acid Rain - We recommend that a note be placed in Section IV, Subsection A, A.2, referencing the NOx requirements indicated under Subsection B, B.2 . This note should clarify that Florida DEP has approved and incorporated the NOx Early Election requirements into the Phase II permit (part).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

Scott CLAIR
Copied Scott 10/21 cgw

OCT 15 1999

4APT-ARB

RECEIVED

OCT 21 1999
DIVISION OF AIR
RESOURCES MANAGEMEN

Howard L. Rhodes, Director
Department of Environmental Protection
Air Resources Management Division
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

OCT 21 1999

BUREAU OF AIR REGULATION

SUBJ: EPA's Review of Proposed Title V Permit
Seminole Electric Cooperative, Inc.
Seminole Power Plant, Palatka, Florida
Permit No. 1070025-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for the Seminole Power Plant, which was posted on DEP's web site on August 31, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), and does not address all operational requirements and limitations to ensure compliance with all applicable requirements as specified under 40 C.F.R. § 70.6(a)(1).

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Elizabeth Bartlett, Florida Title V Contact, at (404) 562-9122, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,

James D. Kutzman for

Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

Enclosure

cc: Mr. James R. Duren, Seminole Electric Cooperative

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Seminole Electric Cooperative, Inc.
Seminole Power Plant
Permit no. 1070025-001-AV

I. EPA Objection Issues

1. Applicable Requirements - As a result of Comments 7.R and 9.R, PSD-based permit conditions A.10. and A.19. were removed from the title V permit. Since PSD permit conditions are considered to be applicable requirements for title V permits, it is unclear why these conditions were removed. Please provide the basis for removing these conditions from the permit, or replace them if they were removed in error.

2. Practical Enforceability - Condition A.3 specifies that steam electric generating units # 1 and # 2 are permitted to fire coal, coal with a maximum of 30 percent petroleum coke (by weight), No. 2 fuel oil, and on-specification used oil. Additionally, the condition limits the rate of petroleum coke combustion to no more than 186,000 pounds per hour (averaged over 24 hours). However, the permit does not contain adequate record keeping to demonstrate compliance with the fuel combustion limits.

   In order for an operational limit to be enforceable as a practical matter there must be a method of establishing compliance with that limit. Condition A.65 requires the source to maintain documentation verifying that the coal and petroleum coke fuel blends that are combusted do not exceed the 30 percent maximum petroleum coke by weight limit. However, the permit does not contain a requirement for the source to record the daily rate of petroleum coke combustion. Therefore, the permit should include a requirement that the source keep daily records of the mass consumption rate of the petroleum coke that is burned in the electric generating units.

3. Appropriate Averaging Times - The particulate matter emission limits in condition A.5, the volatile organic compound (VOC) emissions limit in condition B.4 , and the visible emissions limits in conditions B.6, C.4, and D.4, do not contain averaging times. Because the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a general condition in the permit stating that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance. If a specific averaging time is selected for the particulate matter emission limit in

condition A.5, Region 4 recommends that a six-hour averaging time be used to be consistent with the requirements of permit condition A.40.

4. Excess Emissions - Condition A.19 includes the following permitting note:

> *Once a written agreement between Seminole Electric Cooperative and the Northeast District office has been acquired approving a "Protocol for Startup and Shutdown", the protocol is automatically incorporated by reference and is a part of the permit.*

EPA Region 4 believes that the "Protocol for Startup and Shutdown" should be subject to public and regulatory review, and processed as a permit modification. Please revise this permitting note to indicate that a permit modification will be required to incorporate this document once it has been approved by the District.

5. Periodic Monitoring: Condition A.50 of the permit requires the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency is justified by the low emission rate documented in previous emissions tests while firing coal and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in condition A.50 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility is required to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time

when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

6. Periodic Monitoring - Condition B.4 specifies that volatile organic compound emissions shall not exceed 11.84 tons per year. Based on the short term limit for this unit (38.75 pounds per hour) and 8,760 hours of operation per year, unit 003 could emit 167.72 tons per year. Since this value exceeds the annual emission limit of 11.84 tons per year, the permit must be revised to ensure that the annual limit is not exceeded through restriction of operating hours or by some other enforceable means.

7. Practical Enforceability - The record keeping requirements of Condition B.10 are not specific enough to adequately demonstrate compliance with the hourly VOC emission limit. In addition to recording the application rate of surface coatings, the source must also maintain records for the density and VOC content of each coating that is used. Additionally, the permit must specify a record keeping frequency that corresponds to the averaging time required under Objection Item 3. If the averaging time is short, the proposed mass balance methodology may not be accurate enough to ensure compliance with the pound per hour limit.

8. Periodic Monitoring - Conditions C.9 and D.9 of the permit require that annual Method 9 tests be conducted for the units listed in the permitting notes. For units with control equipment, this usually does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

II. General Comments

1. Compliance Certification - Facility-wide Condition 12 of the permit should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA.

2. Excess Emissions - Conditions A.19 and A.20 address the occurrence of excess emissions from the electric generating units. More specifically, excess emission resulting from malfunction are permitted provided that best operational practices to minimize emission are adhered to and the duration of excess emissions are minimized. EPA has recently addressed the issue of excess emissions in a September 20, 1999, policy memorandum from Steven A. Herman, Assistant Administrator for Enforcement and Compliance Assurance, and Robert Perciasepe, Assistant Administrator for Air and Radiation. The September 20, 1999, memo reaffirms and supplements the EPA's original policy regarding excess emissions during malfunction, startup, shutdown, and maintenance, which is contained in memoranda from Kathleen Bennett, formerly Assistant Administrator for Air, Noise and Radiation dated September 28, 1982, and February 15, 1983. The permit conditions that address excess emissions should be consistent with EPA's policy.

3. Minimum Sample Volume for Particulate Testing - Condition A.40. specifies a sample time and volume of at least 120 minutes and 60 dry standard cubic feet, respectively, for particulate testing, in accordance with 40 CFR 60.48a(b) and 40 CFR 60.11(b). Condition A.48 specifies a sample time from one to four hours and a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are inconsistent, a permitting note should be added to Condition A.48. to clarify the required sample time and volume or refer the permittee to Condition A.40.

4. Frequency of Compliance Tests - Condition B.9 is unclear about whether compliance testing is required on an annual basis or just prior to renewal. Conditions C.9 and D.9 each contain permitting notes which clarify which units are to be tested annually, if any. A similar permitting note should be added for Condition B.9.

5. Acid Rain - The Phase II Acid Rain Application/Compliance Plan dated December 5, 1995, the Phase I Acid Rain permit dated March 27, 1997, and the Phase II NO_x Compliance Plan dated November 21, 1997, which are referenced as attachments made part of the permit should also be referenced under Section IV, Subsection A.1.

6. Acid Rain - We recommend that a note be placed in Section IV, Subsection A, A.2, referencing the NOx requirements indicated under Subsection B, B.2 . This note should clarify that Florida DEP has approved and incorporated the NOx Early Election requirements into the Phase II permit (part).

Date: 4/7/98 10:06
From: Ed Svec TAL
Subject: Re: Title V : Seminole Electric
To: Mike Roddy

Ed: Robert Manning indicated to me that in a recent conversation he had
with Scott Sheplak that the only remaining issues with our permit appears to be with ambient air monitoring and the MW load vs. heat input.
Based on Mannings conversation with Sheplak and the Departments response
to EPA's objection to the FPL permits we have put together some language
to be added to the "Brief Description" section and also as a permitting
note under condition A.1. I think this should work for both of us.
Please review and let me know what you think and keep me posted on what's going on with the ambient monitoring issue. Thanks Mike Roddy.

Mike:
We thank you for the suggestion. However, it is our opinion after dealing with the EPA objections to the FPL permits that the MMBtu/hr heat input limitations must remain in the permit and be monitored because:
1. The heat input limits the capacity of the unit.
2. The heat input sets the emissions limits in pounds per hour and tons per year.
3. Heat input is the basis of the emissions limits in the NSPS.
4. The EPA requires demonstration of continuing compliance. In this case the would require compliance on a 3-hour average because that is the stack testing duration.

Is there not some reasonable method that the heat input could be estimated by using, say, the Btu content supplied by the vendor and the usage rate? Let us know what you think.

Ed Svec

Date: 4/3/98 6:28:28 PM
From: Mike Roddy
Subject: Title V : Seminole Electric
To: svec_e

Ed: Robert Manning indicated to me that in a recent conversation he had with Scott Sheplak that the only remaining issues with our permit appears to be with ambient air monitoring and the MW load vs.heat input. Based on Mannings conversation with Sheplak and the Departments response to EPA's objection to the FPL permits we have put together some language to be added to the "Brief Description" section and also as a permitting note under condition A.1. I think this should work for both of us. Please review and let me know what you think and keep me posted on what's going on with the ambient monitoring issue. Thanks Mike Roddy.

Section III. Emissions Unit(s) and Conditions

Subsection A.

Brief Description

Steam Electric Generator Nos. 1 and 2 are coal fired utility, dry bottom wall-fired, each having a generator nameplate rating of 714.6 megawatts, electric. The maximum heat input to each emissions unit is 7,172 million Btu per hour. This heat input number is placed in this permit to identify the capacity of units 1 and 2 for 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 of the test load). Regular record keeping is not required for heat input. The permittee is only required to determine heat input whenever emissions testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Such heat input determination may be based on measurements of fuel consumption by various methods including the determination of megawatts generated, and the heat value of the fuel determined by the fuel vendor or the permittee. Steam Electric Generator Nos. 1 and 2 are each equipped with an electrostatic precipitator (ESP) to control particulate matter, a wet limestone flue gas desulfurization (FGD) unit to control sulfur dioxide, and low NO_x burners, and low excess-air firing to control nitrogen oxides.

(Permitting Note For Condition A.1)

This heat input number is placed in this permit to identify the capacity of units 1 and 2 for 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 of the test load). Regular record keeping is not required for heat input. The permittee is only required to determine heat input whenever emissions testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Such heat input determination may be based on measurements of fuel consumption by various methods including the determination of megawatts generated, and the heat value of the fuel determined by the fuel vendor or the permittee.

RFC-822-headers:
Received: from mml.sprynet.com (mml.sprynet.com) by EPIC66.DEP.STATE.FL.US
 (PMDF V5.0-8 #7204) id <01IVFP8FXECG0004TN@EPIC66.DEP.STATE.FL.US> for
 svec_e@dep.state.fl.us; Fri, 03 Apr 1998 14:26:54 -0400 (EDT)
Received: from host116.seminole-electric.com ([207.120.117.116])
 by mml.sprynet.com with SMTP id <227710-26742>; Fri, 03 Apr 1998 11:19:50 -0800
Organization: Seminole Electric Cooperative, Inc
X-Mailer: Mozilla 3.0 (Win16; I)

HOPPING GREEN SAMS & SMITH
PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS
123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(850) 222-7500
FAX (850) 224-8551
FAX (850) 425-3415
Writer's Direct Dial No.
(850) 425-2263

JAMES S. ALVES
BRIAN H. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
RALPH A. DeMEO
THOMAS M. DeROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
MICHAEL P. PETROVICH
DAVID L. POWELL
WILLIAM D. PRESTON
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
GARY P. SAMS
ROBERT P. SMITH
CHERYL G. STUART

GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
ANGELA R. MORRISON
GARY V. PERKO
KAREN M. PETERSON
R. SCOTT RUTH
W. STEVE SYKES
T. KENT WETHERELL, II

OF COUNSEL
W. ROBERT FOKES

February 3, 1998

RECEIVED
FEB 03 1998
BUREAU OF
AIR REGULATION

BY HAND-DELIVERY

Scott Sheplak
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Re: Supplemental Comments on the Seminole Draft Title V Permit
Permit No. 1070025-001-AV

Dear Mr. Sheplak:

On behalf of Seminole Electric Cooperative, Inc. (Seminole), this letter is written to provide supplemental comments on Seminole's Draft Title V Permit, specifically Conditions A.21 and A.22 relating to excess emissions. Seminole appreciates the Department's continued cooperation in processing its Title V permit. After you have reviewed the information in this letter, please contact either Mike Roddy at Seminole at (813) 963-0994 or myself at the number listed above at your earliest convenience.

On pages 5 and 6 of Seminole's October 15, 1997 comment letter, Seminole requested that the excess emissions provisions in Conditions A.21 and A.22 (derived from Rule 62-210.700, Fla. Admin. Code) be deleted and that the applicable excess emissions provisions from 40 CFR Part 60 be moved to this section of the Title V permit. In the Department's written response and subsequent meeting on December 9, 1997, we understood the Department to take the position that the excess emission provisions under 40 CFR Part 60 do not apply to Seminole's facility because Seminole's facility is already in operation, i.e., the NSPS provisions only apply up until the facility completes its initial performance testing, and from that point forward, the rules under 62-210.700, Fla. Admin. Code govern the continuing operation of the facility.

After reviewing the pertinent regulations, Seminole respectfully disagrees with the Department's position and reiterates its request that the excess emission provisions under 40 CFR Part 60 be clarified to apply to Units 1 and 2, and that the excess emissions provisions derived from Rule 62-210.700, Fla.

Admin. Code be deleted from its Title V permit. Seminole's conclusion and request is based upon the express provisions under 40 CFR Part 60, and the fact that the Department has incorporated these provisions into its rules in Rule 62-204.800, F.A.C. Specifically, Section 60.11(a) states that "compliance with standards in this part . . . shall be determined only by performance tests established by § 60.8." The "standards" referenced in this section that are applicable to Seminole's Units 1 and 2 (i.e., Subpart Da) apply "on and after the date on which the performance test required to be conducted by 60.8 is completed." See 40 CFR §§60.42a(a), 60.43a(a), 60.44a(a) (emphasis added). Because these standards expressly apply after the initial performance test and Section 60.11 says that compliance with these standards shall be determined in accordance with Section 60.8, then the excess emission provisions under Section 60.8 necessarily must apply to Seminole's Units 1 and 2.

Moreover, DEP's incorporation by reference into Florida's rules of each of the referenced provisions (i.e., Sections 60.8, 60.11 and the provisions under Subpart Da) make the federal excess emission provisions applicable requirements for Seminole as a matter of state law. Even if both Rule 62-204.800, Fla. Admin. Code and Rule 62-210.700, Fla. Admin. Code could be applicable to Seminole's facility, the more specific provision must apply. This is a basic tenant of regulatory construction. McKendry v. State, 641 So. 2d 45 (Fla. 1994); 42 FLA. JUR. 2d *Statutes* § 182 (1984). Because Seminole's Units 1 and 2 must comply with the requirements under NSPS Subpart Da, and the provisions under Rule 62-210.700, Fla. Admin. Code apply generally to emissions units in Florida, the NSPS excess emissions provisions more specifically apply and therefore must govern Seminole's operation. In fact, all of these NSPS provisions are already contained in other sections of the draft Title V permit in a manner that makes them applicable to Units 1 and 2. Accordingly, Seminole reiterates its request that Conditions A.21 and A.22 be deleted from the permit and that the federal excess emissions provisions in 40 CFR 60.8(c), 60.11(c), 60.11(d), 60.46a(c), and 60.46a(d)(1) & (2) be included to this area of the permit.

Thank you again for your consideration of our comments. We look forward to discussing this issue with you in the near future.

Sincerely,

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning
Robert A. Manning

ATTORNEYS FOR SEMINOLE
ELECTRIC COOPERATIVE, INC.

RAM/clh
cc: Clair Fancy, DEP
Pat Comer, DEP OGC
Ed Svec, DEP
Mike Roddy, Seminole

2/4/98 cc: Scott Sheplak

Date: 1/7/98 2:19:27 PM
From: Mike Roddy
Subject: Permit Notes
To: SVEC_E

Ed: Attached are permit notes for the railcar maintenance, coal storage yard, and limestone and FGD areas.Please note that the specific emission points listed in C.9 and D.9 are slightly different than we proposed originally. The change is based on my understanding that you are mainly concerned with VE testing at points with dust controls (baghouses,panel filters). Do you have an Idea when we might receive your next permit rework ? Please give me a call after you get a chance to look at these notes. Thanks.

PERMITTING NOTES FOR RAILCAR MAINTENANCE, COAL STORAGE YARD, AND LIMESTONE AND FGD SLUDGE HANDLING AND STORAGE SYSTEM

RAILCAR MAINTENANCE FACILITY

Monitoring of Operations

B.5 (Permitting Note: Emission limiting standards for the railcar maintenance emission unit consist only of visible emissions (VE) and volatile organic compounds (VOC). A determination of compliance with either emission limiting standard is through product constituents and use and is not dependent on the use of instruments or equipment to determine process variables.)

Test Methods and Procedures

B.8 (Permitting Note: EPA Method 9 has been previously specified as the applicable opacity test method. Potential PM emissions are less than 100 tpy.)

PERMITTING NOTES FOR RAILCAR MAINTENANCE, COAL STORAGE YARD, AND LIMESTONE AND FGD SLUDGE HANDLING AND STORAGE SYSTEM

COAL STORAGE YARD

Monitoring of Operations

C.5 (Permitting Note: Emission limiting standards for the coal handling and storage emission unit consist only of visible emissions (VE). Compliance with the VE standard is determined using EPA Method 9. A determination of compliance with the VE emission limiting standard is not dependent on the use of instruments or equipment to determine process variables.)

Test Methods and Procedures

C.7 (Permitting Note: The permitted capacity of the coal handling and storage emission unit is based on conveyor belt capacity. Conveyor belt speed is set and does not vary during normal operation. However, feeder belts which supply coal to the conveyor belts are variable speed. Bins, crushers, and silos are filled on a batch process basis by the conveyor belts which are either on or off. The period at which the highest opacity emissions can reasonably be expected to occur at the emission points subject to the standard i.e. (CH-002, CH-011, and CH-012 a and b) will be when the conveyor belts are on during normal operation. Therefore the period during which the conveyor belts are on during normal operation shall represent permitted capacity of this emission unit for purposes of compliance testing.

C.8 (Permitting Note: EPA Method 9 has been previously specified as the applicable opacity test method.)

C.9 (Permitting Note: The individual coal handling and storage emission points requiring an annual VE test are those containing baghouse controls. These baghouse locations are emission points CH-002, CH-011, and CH-012 a and b.)

PERMITTING NOTES FOR RAILCAR MAINTENANCE, COAL STORAGE YARD, AND LIMESTONE AND FGD SLUDGE HANDLING AND STORAGE SYSTEM

LIMESTONE AND FGD SLUDGE HANDLING AND STORAGE SYSTEM

Monitoring of Operations

D.5 (Permitting Note: Emission limiting standards for the limestone and FGD sludge handling and storage emission unit consist only of visible emissions (VE). Compliance with the VE standard is determined using EPA Method 9, which is not dependent on the use of instruments or equipment to determine process variables.)

Test Methods and Procedures

D.7 (Permitting Note: The permitted capacity of the limestone handling and storage emission unit is based on trucks per hour. Trucks per hour has no bearing on determining the period at which the highest opacity emissions can reasonably be expected to occur at emission point L-001. Normal operating conditions when trucks are delivering/unloading constitute the appropriate time period for VE testing. Therefore such periods shall represent permitted capacity for compliance testing.

D.8 (Permitting Note: EPA Method 9 has been previously specified as the applicable opacity test method.)

D.9 (Permitting Note: The individual limestone and FGD sludge handling points requiring an annual VE test are those containing filter and wet scrubber equipment. These locations are emission points L-001, FGD-001 or FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, FGD-007 or FGD-008, and FGD-009 or FGD-010.)

RFC-822-headers:
Received: from mm1.sprynet.com (mm1.sprynet.com) by EPIC66.DEP.STATE.FL.US
(PMDF V5.0-8 #7204) id <01IS3BI4O64G0019ND@EPIC66.DEP.STATE.FL.US> for
SVEC_E@dep.state.fl.us; Wed, 07 Jan 1998 10:18:46 -0400 (EDT)
Received: from host116.seminole-electric.com ([207.120.117.116])
by mm1.sprynet.com with SMTP id <228170-2638>; Wed, 07 Jan 1998 07:13:48 -0800
Organization: Seminole Electric Cooperative, Inc
X-Mailer: Mozilla 3.0 (Win16; I)

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

October 15, 1997

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Seminole Electric Cooperative, Inc.
DRAFT Title V Permit No. 1070025-001-AV

Dear Mr. Sheplak:

On behalf of Seminole Electric Cooperative, Inc. (Seminole), attached are comments regarding the DRAFT Title V permit for the Seminole Power Plant as identified above. Seminole appreciates the Department's efforts in processing our Title V permit and understands the need to resolve any outstanding issues in a timely manner. In this regard, Seminole previously obtained agreement from the Department, and filed a Request for an Extension, up to and including October 24, 1997, to allow the submittal and resolution of comments. If we are unable to reach a resolution of the following comments by this time, we would appreciate the opportunity to file an additional Request for Extension of Time.

As a general matter, Seminole is very interested in being issued the highest quality permit possible, which should include the drafting of conditions specific to Seminole's emission units which reflect our mutual interpretation of Seminole's applicable requirements. As you will see, Seminole's comments were developed with this goal in mind.

After you have had a chance to review these comments, please contact me at (813) 963-0994.

Sincerely,

Mike Roddy
Environmental Engineer

cc: Mike Opalinski
Clair Fancy, P.E., DEP
Ed Svec, DEP
Tom Davis, P.E., ECT
Robert Manning, HGSS

10/16/97 cc: Scott Sheplak

RECEIVED
OCT 15 1997
BUREAU OF
AIR REGULATION

16313 NORTH DALE MABRY HIGHWAY • P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994

SEMINOLE ELECTRIC COOPERATIVE
COMMENTS ON DRAFT TITLE V PERMIT
SEMINOLE POWER PLANT

General Comments

1. Seminole understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next month. Accordingly, Seminole requests that its Title V permit reflect the most up-to-date version of this Appendix.

2. Seminole understands that DEP intends to publish the Notice of Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, Seminole requests that DEP provide a copy of the Notice, as well as proof of publication.

Intent to Issue Title V Air Operation Permit

1. The description in the Intent to Issue, as well as several other parts of the draft permit, incorrectly states that Seminole's Title V application was submitted on June 17, 1996. The correct submittal date is June 14, 1996.

Referenced Attachments Made Part of This Permit

1. The wholesale incorporation of the Appendix for 40 CFR 60 Subpart A is inappropriate and should be deleted. See comments to Conditions A.68 and C.11.

Section I., Facility Information, Subsection B.

1. Because the original listed activities are exempt pursuant to Rule 62-210.300(3)(a)20., F.A.C., and Rule 62-210.300(3)(a)21., F.A.C. Seminole requests the deletion of the two activities listed as Unregulated Emission Units and or Activities and the addition of the following activity. The added activity addresses unregulated activities (described as Emission Unit ID 8 in the Title V permit application) not otherwise covered in the draft Title V permit.

~~-xxx One or more emergency generators not subject to the Acid Rain Program~~
~~-xxx One or more heating units and general purpose internal combustion engines not subject to the Acid Rain Program~~
-xxx General plant fugitives including plant-wide abrasive blasting, painting, moveable abrasive blast material bin, soil borrow pit, and vehicular travel on unpaved roads.

Section II., Facility-wide Conditions.

1. Condition 1. Seminole requests that the edition date be included for Appendix TV-1.

2. Condition 2. The word "not" was apparently inadvertently added, and should be deleted from, the second line of this Condition. FPC requests that Condition 2. be revised as follows: "**Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall ~~not~~ cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objecitonable odor. [Rule 62-296.320(2), F.A.C.]

3. Condition 4. As was indicated in Section II, D.12. of the Title V permit application, the Seminole Power Plant processes do not have any regulated substances above the threshold amounts specified in 40 CFR Part 68, §68.130 and therefore, the facility is not subject to the CAA 112(r) accidental release regulatory program. Condition 4 should be deleted.

4. Condition 7. For clarity, Seminole requests that the first sentence of this Condition be edited as follows: "**The permittee shall not ~~allow no person to~~ store, pump . . . .**" Also, because this condition is not included in Florida's SIP (based on our research), and to be consistent with other permits issued by DEP, this condition should be marked as "Not Federally Enforceable."

5. Condition 8. Seminole requests the following revision to clarify that unconfined particulate matter control measures are only required on an as-needed basis:

> Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include the following on an as-needed basis: chemical or water application to unpaved roads or unpaved yard areas; paving and maintenance of roads, parking areas and plant grounds; landscaping and planting of vegetation; confining abrasive blasting where possible; and other techniques, as necessary. [Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 17, 1996.]

Section III. Subsection A.

1. Seminole requests that the description for these units be revised as follows: "...the maximum heat input to each emissions unit is 7,172 million Btu per hour (based on fuel sampling and analysis). . . ."

2. Under the permitting notes in the description, the date for the BACT determination should be corrected to August 9, 1979, instead of June 15, 1979.

3. Condition A.1. Seminole requests the following revision to this condition: "The maximum operation heat input rate, on a monthly average, is as follows:"

4. Condition A.3. For clarification, Seminole requests the following revisions to this condition: "The only fuels allowed to be fired in each unit are coal . . . . The maximum weight of petroleum coke burned in each unit shall not exceed . . . Also the regulatory citation for this condition should either be deleted or include a specific citation to Rule 62-213.410(1), F.A.C.

5. Conditions A.5. and A.6. Seminole requests the combination of these two Conditions as follows to clarify that the 0.03 lb/MMBtu PM limit applies to all solid and liquid fuels (i.e., coal, coal and petroleum coke blends, No. 2 fuel oil, and on-specification used oil). Compliance provisions are addressed separately in Condition A.24 and therefore need not be repeated in Condition A.5.

> Particulate Matter (All Solid and Liquid Fuels). No owner or operator shall cause to be discharged into the atmosphere when combusting solid and/or liquid fuels ~~a coal and petroleum coke blend~~ any gases which contain particulate matter in excess of 13 ng/J (0.03 lb/million Btu) heat input, and one percent of the potential combustion concentration (99 percent reduction) when combusting solid fuels, and 30 percent of the potential combustion concentration (70 percent reduction) when combusting liquid fuels. [40 CFR 60.42a(a) and PSD-FL-018(A)]

6. Conditon A.8. Seminole requests the following revision to Condition A.8.(1) to add the NSPS Subpart Da SO_2 90 percent reduction requirement for coal firing. Condition A.8.(3) emission limits only apply to liquid or gaseous fuel combustion per 40 CFR 60.43a(b) and therefore should be deleted from Condition A.8. which addresses SO_2 emission limits for coal only.

> (1) 520 ng/J (1.20 lb/million Btu) heat input and 10 percent of the potential combustion concentration (90 percent reduction), or

7. Condition A.9. Seminole requests the following revision to Condition A.9.(1) adds the NSPS Subpart Da SO_2 90 percent reduction requirement for liquid fuel combustion:

> (1) 340 ng/J (0.80 lb/million Btu) heat input and 10 percent of the potential combustion concentration (90 percent reduction), or

8. Condition A.10. This condition has been superseded by NSPS Subpart Da requirements and therefore is obsolete and should be deleted.

9. Condition A.15 and A.17. Seminole requests the following revisions to clarify the NSPS Subpart Da requirements and combine Conditions A.15 and A.17. Compliance provisions are addressed separately in Condition A.25 and therefore need not be repeated in Condition A.15.

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 nitrogen oxides in excess of the following emission limits, ~~based on a 30 day rolling average~~.

(1) NO_x emissions limits:

(a) ~~Bituminous coal emission limit for heat input:~~ 260 ng/J (0.60 lb/million Btu) heat input determined on a 30-day rolling average when combusting bituminous coal or bituminous coal and petroleum coke blends;

(b) ~~All other liquid fuels emission limit for heat input:~~ 130 ng/J (0.30 lb/million Btu) heat input determined on a 30-day rolling average when combusting liquid fuels, and

(c) 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.

(2) NO_x reduction requirement. Solid fuels: 65 percent reduction of potential combustion concentration; Liquid fuels: 30 percent reduction of potential combustion concentration. [40 CFR 60.44a(a)(1) & (2) and PSD-FL-018(A)]

10. Condition A.18. For clarification, Seminole requests the following revision: "Only"on-specification" used oil shall be fired in each ~~this~~ unit."

11. Condition A.19. This Condition should be deleted because there is no regulatory or prior-permit authority for its inclusion.

12. Condition A.20. Condition A.20. is not applicable to NSPS Subpart Da affected sources and should be deleted. The condition requirements and regulatory citation for Condition A.20. is from NSPS Subpart D. Per 40 CFR 60.40(e), any facility covered under Subpart Da is not covered under Subpart D.

13. Condition A.21 and A.22. These Conditions should be deleted because these units are subject to the NSPS excess emission provisions; the state excess emission provisions do not apply. All of the emission limits to which these units are subject are NSPS limits. Accordingly, the NSPS excess emission provisions from 40 CFR 60.8(c), 60.11(c), 60.11(d), 60.46a(c), and 60.46a(d)(1) & (2) should be added in this area of the permit. The regulatory citation for these new Conditions should be the 40 CFR cites, as well as Rule 62-204.800, F.A.C. Note that the provisions from 60.46a(c) and 60.46a(d)(1) & (2) are included in the draft permit Conditions

A.26. and A.27. The language out of A.26. and A.27. therefore, should simply be moved to this area of the permit.

14. Condition A.31. On line 6 of this Condition, the phrase "is experienced" was apparently inadvertantly included twice.

15. Condition A.35. Seminole requests the following revision to incorporate the requirements of 40 CFR 60.47a(e); i.e., Condition A.35 does not apply to the COMS required by Condition A.31.

> "The continuous monitoring systems required under Conditions A.32., A.33., and A.34 are operated . . ."

16. Condition A.42. Subparagraph 2(ii). The words "transverse" in this subparagraph should be revised to read "traverse." Also, subparagraph 3 of Condition A.42. should be deleted because Seminole uses COM's to determine compliance with the opacity standard.

17. Condition A.46. Seminole requests the deletion of paragraph (c) because each batch of used oil will be analyzed for the constituents listed in Condition A.18. If a batch of used oil is found to contain concentrations of any constituent in excess of those listed in Condition A.18., that batch would not would not meet the definition of "on-specification" used oil and would not be combusted in Units 1 or 2. However, that analysis should have no bearing on the acceptability of other batches of used oil; i.e., each batch of used oil should be treated separately with respect to being classified as "on-specification" used oil. Also, the regulatory citation supplied by DEP for this Condition appears to be misplaced.

18. Condition A.50. Seminole requests the following amendments to this Condition: (i) Condition A.50.(a)1. should be deleted. Units 1 and 2 are subject to annual compliance testing for PM. Sampling time for PM testing is specified in Condition A.42.(2)(i). Having two conditions which address the same issue is redundant and potentially confusing.

(ii) Condition A.50.(a)2.a. is not applicable because Units 1 and 2 or not batch, cyclical processes or operations which are normally completed within less than the minimum observation period.

(iii) Condition A.50.(a)2.c. addresses requirements pertinent to FDEP employees or their agents and therefore should not be included in the Title V permit; i.e., the requirements do not apply to Seminole.

(iv) Condition A.50.(b) should be deleted. Units 1 and 2 are subject to annual compliance testing for PM. Sampling volume for PM testing is specified in Condition

A.42.(2)(i). Having two conditions which address the same issue is redundant and potentially confusing.

19. Condition A.52. Because Condition A.52(a) is a specific condition that only applies to Units 1 and 2, the requested condition revisions state only the specific requirements for these emission units; i.e., eliminates generic language. The requested revisions to Condition A.52.(a)(4) clarify that annual testing is only required for PM. Because compliance with the remaining regulated pollutants for Units 1 and 2 (i.e., SO_2, NO_x, and visible emissions) are determined continuously using CEMS, performing an annual compliance test for these two pollutants is not necessary. The SO_2 and NO_x CEMS are operated, maintained, and certified pursuant to 40 CFR Part 75 requirements, including an annual Relative Accuracy Test Audit (RATA) using EPA reference methods.

The following provisions apply only to Units 1 and 2. ~~emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) ~~General~~ Compliance Testing.

~~2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.~~

~~3.~~1. ~~a~~ A compliance test that demonstrates compliance with the applicable particulate matter and visible emission limiting standards specified in Condition A.5. and Condition A.7. shall be submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~The most recent annual compliance test may be submitted to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for Units 1 and 2 if the units ~~any emissions unit that~~, during the year prior to renewal:

a. Did not operate; or

b. ~~In the case of a fuel burning emissions unit, b~~Burned liquid and/or solid fuel for a total of no more than 400 hours.

~~4.~~2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. ~~Visible emissions, if there is an applicable standard;~~ and
b. Particulate Matter. ~~Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and~~
~~c. Each NESHAP pollutant, if there is an applicable emission standard.~~

~~5.~~3. An annual compliance test for particulate matter or visible emissions shall not be required ~~for~~ if a unit ~~the any fuel burning emissions unit that~~, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

~~9.~~4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

20. Condition A.53. Because these units are also subject to the Federal Acid Rain Program, Seminole requests the deletion of the existing language for this Condition and the insertion of the following language in its place: "Compliance with the applicable provisions of 40 CFR Part 75 is deemed compliance with 40 CFR 60.49a(a)."

21. Condition A.55. Seminole requests the following revision incorporates the specific language of 40 CFR 60.49a(c).

If the ~~required~~ minimum quantity of emission data as required . . ."

22. Condition A.63. This condition should be deleted because it is redundant with Condition A.54; i.e., both require the submittal of quarterly excess emissions reports, including the reasons for non-compliance.

23. Condition A.65 and A.66. For clarification, Seminole requests the addition of the following sentence to the beginning of these Conditions: "This Condition shall only apply during any calendar year in which on-specification used oil is burned in this unit."

24. Condition A.68. Because it is inappropriate to simply attach an Appendix of provisions out of the NSPS for wholesale incorporation into this permit, Seminole requests the following revision to this Condition: "The Permittee shall comply with the applicable requirements contained in ~~Appendix~~ 40 CFR 60, Subpart A. ~~attached to this permit.~~"

25. Condition A.71. This Condition should be deleted because it is not applicable to NSPS Subpart Da affected sources. The Condition provisions and regulatory citation for Condition A.71. are from NSPS Subpart D. Per 40 CFR 60.40(e), any facility covered under Subpart Da is not covered under Subpart D.

26. Conditions A.72, A.73., A.74, A.75. and A.76. Seminole requests the deletion of these Conditions. Although Seminole was only actually required to conduct ambient monitoring for five years after the issuance of its PSD Permit in 1979, ambient monitoring for PM and SO_2 has been conducted by Seminole for many years. During this time period, measured concentrations of PM and SO_2 have been consistently well below applicable National and State Ambient Air Quality Standards (AAQS). Moreover, DEP also has a monitoring network established in Palatka which is less than two miles from Seminole's monitors. Accordingly, continuation of ambient monitoring does not appear to serve any purpose.

Conditions A.74. and A.76. require Seminole to convert the existing total suspended particulate (TSP) sampler to one that measures either PM_{10} or $PM_{2.5}$. Seminole considers this requirement to be unreasonable and without regulatory basis. National and State AAQS are not applicable requirements for permanent emission sources and therefore ambient monitoring is not an appropriate requirement to be included as a Title V permit condition.

Section III. Subsection B. Railcar Maintenance Facility

1. For your convenience, attached to this comment letter is a recently recompiled Conditions of Certification for the Seminole Power Plant.

2. Condition B.1. This Condition should be deleted based on a March 2, 1995 modification to the Conditions of Certification.

3. Condition B.4. Based on the March 2, 1995 to modification of the Conditions of Certification, Seminole requests the following revision to this Condition: "Volatile organic compound emissions shall not exceed ~~37.7~~ 38.75 pounds per hour or ~~7.84~~ 11.84 tons per year."

4. Condition B.5. Condition B.5 should be deleted because it is not applicable to the railcar maintenance emission unit. Emission limiting standards for the railcar maintenance emission unit consists of visible emissions (VE) and volatile organic compounds (VOCs). Compliance with the VE standard is determined using EPA Method 9 and compliance with the VOC standard is determined using a material balance. A determination of compliance with either emission limiting standard is not dependent on the use of instruments or equipment to determine process variables; i.e., the emission limitations are fixed and do not depend on the value of a process variable.

5. Condition B.6. For clarification, the phrase "pursuant to Chapter 62-297, F.A.C." appears to be misplaced and should be deleted from this Condition.

6. Conditions B.8. Seminole requests the following revisions to clarify the specific VE testing requirements applicable to the railcar maintenance emission unit; i.e., EPA Method 9 has been previously specified as the applicable opacity test method and potential PM emissions are less than 100 tpy. Condition B.8.(a)c. addresses requirements pertinent to FDEP employees or their agents and therefore should not be included in the Title V permit; i.e., the requirements do not apply to Seminole.

(a) Required Sampling Time.

2.Opacity Compliance Tests. ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~ The required minimum period of observation for a compliance test shall be ~~sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and~~ thirty (30) minutes. ~~for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple valued opacity standard.~~ The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. ~~Exceptions to these requirements are as follows:~~

~~c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day to day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.~~

[Rule 62-297.310(4)(a)2.c., F.A.C.]

7. Condition B.9. Seminole requests the following revisions because Condition B.9 is a specific condition that only applies to the railcar maintenance emission unit. The requested revisions state only the specific requirements for this emission unit; i.e., eliminates generic language.

The following provisions apply only to the railcar maintenance emission unit. ~~those emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) ~~General~~ Compliance Testing.

~~3.~~1. ~~The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a~~ A compliance test that demonstrates compliance with the ~~applicable~~ visible emission limiting standard specified in Condition B.3. shall be conducted and submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~ The most recent annual compliance test may be submitted to satisfy the

requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results if the railcar maintenance emission unit did not operate ~~for any emissions unit that,~~ during the year prior to renewal ~~a. did not operate~~;

~~4.~~2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, ~~the owner or operator of each emissions unit shall have~~ a formal compliance test shall be conducted for~~:--a.~~ visible emissions~~.--if there is an applicable standard;~~

~~9.~~3. ~~The owner or operator shall notify t~~The Department shall be notified, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

8. Condition B.11. Seminole requests the following revisions state the specific VE test reporting requirements applicable to the railcar maintenance emission unit.

~~(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.--~~
~~(b) -----The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.~~

The results of each visible emission compliance test shall be filed with the Department in a test report as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8), F.A.C.]

Section III. Subsection C. Coal Storage Yard

1. Condition C.4. The NSPS excess emission provisions should be inserted, specifically 40 CFR 60.11(c), 60.11(d) and 60.46a(c).

2. Condition C.5. Condition C.5 is not applicable to the coal handling and storage emission unit and should be deleted. Emission limiting standards for the coal handling and storage emission unit consist of visible emissions (VE). Compliance with the VE standard is determined using EPA Method 9. A determination of compliance with the VE emission limiting standard is not dependent on the use of instruments or equipment to determine process variables; i.e., the emission limitation is fixed and does not depend on the value of a process variable.

3. Condition C.6. The phrase "pursuant to Chapter 62-297 F.A.C." is an incorrect reference and should be deleted. Also, the regulatory citation for this condition should be 40 CFR 60.11(b) instead of 60.252(c).

4. Condition C.7. and C.8. Because this unit is only subject to an opacity limit and because Condition C.8(a)2. indicates that "The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur," Condition C.7. should be deleted.

Also, for clarification, Seminole requests the following revisions:

Applicable Test Procedures.

(a) Required Sampling Time.

~~2.~~Opacity Compliance Tests. ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, The~~ required minimum period of observation for a compliance test shall be ~~sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and~~ thirty (30) minutes. ~~for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple valued opacity standard.~~ The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. ~~Exceptions to these requirements are as follows:~~

~~c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day to day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.~~

[Rule 62-297.310(4)(a)2.c., F.A.C.]

5. Condition C.9. Seminole requests the following revisions because Condition C.9 is a specific condition that only applies to the coal handling and storage emission unit, the requested condition revisions state only the specific requirements for this emission unit; i.e., eliminates generic language. The individual, representative coal handling and storage emission points requiring an annual VE test are also specified, which include all three bag houses for this unit.

The following provisions apply only to representative coal handling and storage emission points CH-001a or b, CH-002, CH-003, CH-004, CH-009a or b, CH-011, and CH-012a or b. ~~those emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) ~~General~~ Compliance Testing.

~~3.~~1. ~~The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a~~ A compliance test that

demonstrates compliance with the ~~applicable~~ visible emission limiting standard specified in Condition C.4. shall be conducted and submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~ The most recent annual compliance test may be submitted to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results if the coal handling and storage emission unit did not operate ~~for any emissions unit that,~~ during the year prior to renewal ~~a. did not operate~~;

~~4.~~2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, ~~the owner or operator of each emissions unit shall have~~ a formal compliance test shall be conducted for~~:~~ ~~a.~~ visible emissions~~. if there is an applicable standard;~~

~~9.~~ 3. ~~The owner or operator shall notify t~~The Department shall be notified, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

6. Condition C.11. In accordance with comments described above for Condition A.68., Seminole requests the following revision to this Condition: "The Permittee shall comply with the applicable requirements contained in ~~Appendix~~ 40 CFR 60, Subpart A. ~~attached to this permit.~~"

Section III. Subsection D - Limestone and FGD Sludge Handling and Storage System

1. Condition D.5. is not applicable to the limestone and FGD sludge handling and storage emission unit. Emission limiting standards for the limestone and FGD sludge handling and storage emission unit consist of visible emissions (VE). Compliance with the VE standard is determined using EPA Method 9. A determination of compliance with the VE emission limiting standard is not dependent on the use of instruments or equipment to determine process variables; i.e., the emission limitation is fixed and does not depend on the value of a process variable.

2. Condition D.6. The phrase "pursuant to Chapter 62-297 F.A.C." is an incorrect reference and should be deleted from this Condition.

3. Conditions D.7. and D.8. Because this unit is only subject to an opacity limit and because Condition D.8. contains this sentence "The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur",

Condition D.7. should be deleted. Also for clarification, Seminole requests the following revision. The requested revisions clarify the specific VE testing requirements applicable to the limestone and FGD sludge handling and storage emission unit; i.e., EPA Method 9 has been previously specified as the applicable opacity test method and potential PM emissions are less than 100 tpy. Condition D.8.(a)c. addresses requirements pertinent to FDEP employees or their agents and therefore should not be included in the Title V permit; i.e., the requirements do not apply to Seminole.

(a) Required Sampling Time.
~~2.~~Opacity Compliance Tests. ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~ The required minimum period of observation for a compliance test shall be ~~sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and~~ thirty (30) minutes. ~~for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple valued opacity standard.~~ The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. ~~Exceptions to these requirements are as follows:~~
~~c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day to day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.~~
[Rule 62-297.310(4)(a)2.c., F.A.C.]

4. Condition D.9. Seminole requests the following revisions because Condition D.9 is a specific condition that only applies to the limestone and FGD sludge handling and storage emission unit. The individual, representative limestone and FGD sludge handling and storage emission points requiring an annual VE test are also specified.

The following provisions apply only to representative limestone and FGD sludge handling and storage emission points L-001, L-006, FGD-001 or FGD-002, FGD-003 or FGD-004, FGD-005 or FGD-006, and FGD-009 or FGD-010. ~~those emissions units that are subject to an emissions limiting standard for which compliance testing is required.~~

(a) ~~General~~ Compliance Testing.

~~3.~~1. ~~The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a~~ A compliance test that demonstrates compliance with the ~~applicable~~ visible emission limiting standard specified in Condition D.4. shall be conducted and submitted to the Department prior to obtaining a renewed operation permit. ~~Emissions units that are required to conduct an annual compliance test may submit t~~ The most recent annual compliance test may be submitted to satisfy the requirements of

this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results if the limestone and FGD sludge handling and storage emission unit did not operate ~~for any emissions unit that,~~ during the year prior to renewal ~~a. did not operate~~; ~~4.~~2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, ~~the owner or operator of each emissions unit shall have~~ a formal compliance test shall be conducted for~~:~~ ~~a.~~ visible emissions~~. if there is an applicable standard;~~ ~~9.~~3. ~~T h e owner or operator shall notify t~~The Department shall be notified, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

5. Condition D.10. Seminole requests the following revisions to state the specific VE test reporting requirements applicable to the limestone and FGD sludge handling and storage emission unit:

Test Reports.
~~(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.~~
~~(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.~~
The results of each visible emission compliance test shall be filed with the Department in a test report as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8), F.A.C.]

Section IV. Acid Rain Part

1. Condition A.1a. should reference the application that Seminole actually submitted rathern than generically reference DEP's form.

2. Condition A.4. This Condition applies to all of the Conditions in this Title V Permit, and not just the Acid Rain Conditions, and therefore this Condition should be moved to the facility wide section of this Permit.

3. Conditions A.5. and B.2. These Conditions do not serve any purpose, and therefore should be deleted.

Appendix U-1, List of Unregulated Emission Units and/or Activities

Transfer deleted activities to Appendix E-1 and add following activity:

~~-xxx One or more emergency generators not subject to the Acid Rain Program~~
~~-xxx One or more heating units and general purpose internal combustion engines not subject to the Acid Rain Program~~
-xxx General plant fugitives including plant-wide abrasive blasting, painting, moveable abrasive blast material bin, soil borrow pit, and vehicular travel on unpaved roads.

The listed activities (emergency generators and heating units and general purpose internal combustion engines are exempt pursuant to Rule 62-210.300(3)(a)20., F.A.C. and Rule 62-210.300(3)(a)21., F.A.C. The added activity addresses unregulated activities (described as Emission Unit ID 8 in the Title V permit application) not otherwise covered in the draft Title V permit.

APPENDIX E-1, List of Exempt Emission Units and/or Activities

Add Items 16. through and 18. as follows:

16. One or more emergency generators which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. One or more heating units and general purpose internal combustion engines which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. Surface coating operatings utlizing only coatings containing 5.0 percent or less VOCs, by volume.
18. Degreasing units using heavier-than-air vapors exclusively, except any unit using or emitting any substance classified as a hazardous air pollutant.

The additional activities listed above are specifically exempt pursuant to Rules 62-210.300(3)(a)20., 21., 24., and 26., F.A.C. and would also be expected to meet the criteria of Rule 62-213.430(6)(b).

Table 1-1, Summary of Air Pollutant Standards and Terms

1. Page 1 of 4. The heading to the Table under Allowable Emissions should include the parenthetical (per unit). Also, the standard for SO_2, for coal and petcoke blend, should include a footnote to include the formula in Condition A.13. Also, the listed standards for SO_2, for coal and petcoke, should contain a notation that they are for petcoke only and the correct standard for coal for Units 1 and 2 is 1.2 pounds per MMBtu. Under the Allowable Emissions area of this Table, Seminole requests the following corrections to the data indicated: The tpy listing for PM, for coal or oil and coal and petcoke blend, should be 943 rather than 942. The tpy for SO_2 on liquid fuel should be 25,131 instead of 26,130. The pounds per hour for SO_2 on coal and petcoke should be 7,538.3/7,491.8 and the tpy should be 33,018/32,814. The tpy for NOx for coal and petcoke blend should be 15,707.

2. Page 2 of 4 should be corrected in accordance with the comments above. Specifically, the pounds per hour and the tons per year for VOC should be 38.75 and 11.84, respectively, and the regulatory citation should be the March 2, 1995 modification of the Conditions of Certification rather than March 26, 1991.

Table 2-1, Summary of Compliance Requirements

1. Page 1 of 4. The compliance method for VE should only indicate CMS because EPA Method 9 is not required. Accordingly, the testing time frequency of "annual" and a "one hour" minimum compliance test duration should be deleted. For SO_2 and NOx, the annual testing time frequency and one hour minimum compliance test duration notation should also be deleted. Finally, the testing for CO and H2SO4 should contain a footnote which states that this testing frequency only applies for 5 years from the initiation of petcoke firing, in accordance with Conditions A.69 and A.70.

Appendix H-1, Permit History/ID Number Changes

1. The "issue" and "revised" dates listed on this Appendix only apply to the PPSA Conditions of Certification and therefore a separate heading should be made for the PSD Permit which was issued on September 9, 1979; the amendment to that PSD Permit should also be referenced as February 7, 1997. Also, a revision date for the Conditions of Certification should be added for March 2, 1995.

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

RECEIVED
SEP 17 1997
BUREAU OF
AIR REGULATION

September 12, 1997

Mr. Ed Svec
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

RE: Seminle Power Plant Title V Permit Application

Dear Mr. Svec:

As a follow up to your recent information request, please find enclosed four sets of updates to the Seminole Electric Cooperative Inc.(SECI) Title V permit application. These updates include the folowing information:

- Signed Authorized Representative Form
- Signed P.E. Certification
- Segment D. Forms for: Coal, Petcoke, No.2 fuel oil, used oil.
- No. 2 fuel oil specification sheet
- No. 2 fuel oil analysis sheet
- Used oil analysis sheet

The enclosed information includes four hardcopy originals and four diskettes containing the electronic version.

Please contact me at (813) 963-0994 if there are any questions regarding the enclosed material.

Sincerely,

Mike Roddy

Mike Roddy
Environmental Engineer

MR/mdj
9/18/97 cc: Ed Svec

16313 NORTH DALE MABRY HIGHWAY • P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Richard Midulla
   ~~**Senior Vice President, Technical Division**~~ Executive Vice President & Gen. Mgr.

2. Owner/Authorized Representative or Responsible Official Mailing Address:

   Organization/Firm: **Seminole Electric Cooperative, Inc.**
   Street Address: **16313 North Dale Mabry Highway**
   City: **Tampa** State: **FL** Zip Code: **33618**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: **(813) 963-0994** Fax: **(813) 264-7906**

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.*

Signature _____ Date 9/17/97

* Attach letter of authorization if not currently on file.

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 98th Street** City: **Gainesville** State: **FL** Zip Code: **32606**
3.	Professional Engineer Telephone Numbers: Telephone: **(352) 332-0444** Fax: **(352) 332-6722**

4. 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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] 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 emission units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision 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

9 | 11 | 97
Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact :

Name : Mr. Mike Roddy
Title : Environmental Engineer

2. Application Contact Mailing Address :

Organization/Firm : Seminole Electric Cooperative, Inc.
Street Address : 16313 North Dale Mabry Highway
City : Tampa
State : FL Zip Code : 33618-____

3. Application Contact Telephone Numbers :

Telephone : (813)963-0994 Fax : (813)264-7906

Application Comment

Initial Title V operating permit application for the existing Seminole Electric Cooperative, Inc. Seminole Power Plant.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal burned in Unit No. 1	
2. Source Classification Code (SCC) : 1-01-002-02	
3. SCC Units : Tons Burned (all solid fuels)	
4. Maximum Hourly Rate : 342.00	5. Maximum Annual Rate : 2,991,749.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 4.30	8. Maximum Percent Ash : 13.00
9. Million Btu per SCC Unit : 21	
10. Segment Comment : Coal-fired unit. Coal sulfur content is a maximum of 4.3 weight %. Data provided in Fields 4, 5, and 9 based on a nominal coal heating value of 10,500 Btu/lb on an as-received basis and maximum heat input of 7,172 MMBtu/hr.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : No. 2 fuel oil burned in Unit No. 1 for startups, flame stabilization, and reserve capacity.	
2. Source Classification Code (SCC) : 1-01-005-01	
3. SCC Units : Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate : 3.32	5. Maximum Annual Rate : 1,664.20
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.50	8. Maximum Percent Ash : 0.01
9. Million Btu per SCC Unit : 136	
10. Segment Comment : No. 2 fuel oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : On-spec used oil burned in Unit No. 1 for startups, flame stabilization, and reserve capacity.	
2. Source Classification Code (SCC) : 1-01-005-04	
3. SCC Units : Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate : 3.32	5. Maximum Annual Rate : 500.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.50	8. Maximum Percent Ash : 0.01
9. Million Btu per SCC Unit : 142	
10. Segment Comment : On-spec used oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Petroleum coke burned in Unit No. 1	
2. Source Classification Code (SCC) : 1-01-002-02	
3. SCC Units : Tons Burned (all solid fuels)	
4. Maximum Hourly Rate : 93.00	5. Maximum Annual Rate : 814,680.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 7.00	8. Maximum Percent Ash : 1.00
9. Million Btu per SCC Unit : 26	
10. Segment Comment : Data provided in Fields 4 and 5 based on PSD Permit No. PSD-FL-018(A) modification Item 6. and Conditions of Certification PA 78-10F modification Section 2.f.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 5

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal and petroleum coke burned in Unit No. 1	
2. Source Classification Code (SCC) : 1-01-002-02	
3. SCC Units : Tons Burned (all solid fuels)	
4. Maximum Hourly Rate : 319.00	5. Maximum Annual Rate : 2,792,299.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 5.10	8. Maximum Percent Ash : 9.40
9. Million Btu per SCC Unit : 23	

10. Segment Comment :

Data provided in Fields 4, 5, 7, 8, and 9 based on a 70/30 weight percent blend of coal/petroleum coke on an as-received basis. Composite sulfur content in Field 7 is based on 4.3% S for coal and 7.0% S for petroleum coke.

Data provided in Fields 4, 5, and 9 based on nominal coal and petroleum coke heating values of 10,500 and 13,000 Btu/lb, respectively, on an as-received basis.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal burned in Unit No. 2	
2. Source Classification Code (SCC) : 1-01-002-02	
3. SCC Units : Tons Burned (all solid fuels)	
4. Maximum Hourly Rate : 342.00	5. Maximum Annual Rate : 2,991,749.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 4.30	8. Maximum Percent Ash : 13.00
9. Million Btu per SCC Unit : 21	
10. Segment Comment : Coal-fired unit. Coal sulfur content is a maximum of 4.3 weight %. Data provided in Fields 4, 5, and 9 based on a nominal coal heating value of 10,500 Btu/lb on an as-received basis and maximum heat input of 7,172 MMBtu/hr.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : No. 2 fuel oil burned in Unit No. 2 for startups, flame stabilization, and reserve capacity.	
2. Source Classification Code (SCC) : 1-01-005-01	
3. SCC Units : Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate : 3.32	5. Maximum Annual Rate : 1,664.20
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.50	8. Maximum Percent Ash : 0.01
9. Million Btu per SCC Unit : 136	
10. Segment Comment : No. 2 fuel oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : On-spec used oil burned in Unit No. 2 for startups, flame stabilization, and reserve capacity.	
2. Source Classification Code (SCC) : 1-01-005-04	
3. SCC Units : Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate : 3.32	5. Maximum Annual Rate : 500.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.50	8. Maximum Percent Ash : 0.01
9. Million Btu per SCC Unit : 142	
10. Segment Comment : On-spec used oil used for startups, flame stabilization, emergency reserve capacity during statewide energy shortages, and limited supplemental load. SECI intends to initiate the utilization of up to 500,000 gallons per year of on-spec used oil (in lieu of No. 2 fuel oil) within the current permit cycle.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Petroleum coke burned in Unit No. 2	
2. Source Classification Code (SCC) : 1-01-002-02	
3. SCC Units : Tons Burned (all solid fuels)	
4. Maximum Hourly Rate : 93.00	5. Maximum Annual Rate : 814,680.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 7.00	8. Maximum Percent Ash : 1.00
9. Million Btu per SCC Unit : 26	
10. Segment Comment : Data provided in Fields 4 and 5 based on PSD Permit No. PSD-FL-018(A) modification Item 6. and Conditions of Certification PA 78-10F modification Section 2.f.	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 5

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Coal and petroleum coke burned in Unit No. 2	
2. Source Classification Code (SCC) : 1-01-002-02	
3. SCC Units : Tons Burned (all solid fuels)	
4. Maximum Hourly Rate : 319.00	5. Maximum Annual Rate : 2,792,299.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 5.10	8. Maximum Percent Ash : 9.40
9. Million Btu per SCC Unit : 23	

10. Segment Comment :

Data provided in Fields 4, 5, 7, 8, and 9 based on a 70/30 weight percent blend of coal/petroleum coke on an as-received basis. Composite sulfur content in Field 7 is based on 4.3% S for coal and 7.0% S for petroleum coke.

Data provided in Fields 4, 5, and 9 based on nominal coal and petroleum coke heating values of 10,500 and 13,000 Btu/lb, respectively, on an as-received basis.

Seminole Power Plant
No. 2 Fuel Oil Description

No. 2 fuel oil will have the following approximate composition:

Parameter	Units	Value
Carbon	Weight %	87.0
Hydrogen	Weight %	12.4
Sulfur	Weight %	0.5
Nitrogen	Weight %	0.1
Heat Content	Btu/lb	19,400

BEST AVAILABLE COPY

FuelSource American

#2 / Diesel

~~FILE~~ Job NO: J7-04-003 LAB NO: ~~69350~~ JA97-04-03

_____ Rush Retain : _____ Client: AGETRA/STEUART

_____ OT Apvd. ____ hrs. Date Rcd: 4/3/97 For : _____

Date Cmpltd: 4/4/97 Contact: _____

Product: HIGH SULFUR DIESEL FUEL Sx Desc.: 3x1QT

Sx ID. : TANK 11 @ ST SAY, FL AFTER ANASAZI

~~SUBMITTED BY CALEB BRETT~~

Sx Comp: ____ EV ____ Vol ____ Wt ____ Avg of _____

D1298	API Gravity	34.4
D93	Flash Point, PMCC, F	154
D4294	Total Sulfur, Wt. %	0.19
D445	Kinematic Viscosity @ 100F, cSt	2.68
D445 /D2161	Kinematic Viscosity @ 100F, SSU	34.9
D482	Ash, Wt. %	<0.002
D1500	ASTM Color	2.0
D1796	Water & Sediment, Vol. %	0
D130	Copper Corrosion, 3 hrs @ 212F	1a
D611	Aniline Point, F	
D976	Cetane Index, calculated	44.2
IP21	Diesel Index, calculated	
D97	Pour Point, F	-10
D2500	Cloud Point, F	+6
D613	Cetane No.	
D974	Neut. No., mgKOH/g	
D524	Carbon Residue, Ramsbottom, Wt. %	
D189	Carbon Residue, (10% Btms) CONRADSON Wt. %	0.02
D2274	Oxidation Stability, mg/100ml	
Dupont/ASTL	Oxidation Stability Pad Rating	2
↳	ASTM Color, after 90 min.	L3.0
D3227	Mercaptan Sulfur, Wt. %	
CPL/WPL	Haze Rating	
D86	Distillation, % Recd/ , F	

IBP	363	30	448	70	547	EP	680
5	387	40	471	80	578	% Rec	99.0
10	402	50	496	90	610	% Res	1.0
20	428	60	520	95	649	% Loss	0

D 1319	OLEFINS, VOL. %	0.9
D 2276	PARTICULATE CONTAMINANT - mg/L	4.4

DYE CONTENT SPTL - 1018 ____:____ 4.0 LBS/1000 BBLS 11.3 ppm

Technician:

Approved:

Faxed/Rptd to:

Date: Time:

BEST AVAILABLE COPY

NORTH USED OIL TANK

MR. MIKE PATRICK
SEMINOLE ELECTRIC COOPERATIVE
P.O. BOX 1577
PALATKA,FL 32178

ENVIROLAB

ANALYTICAL REPORT

Submission Number: 9701000205
Date Received: 01/15/97
Date Reported: 01/31/97

Client's P.O. Number:
Project Number:
Project Name: OIL

Lab Sample Number: 9701205 1
Client Sample Number: 96-612
Sample Description: NORTH USED OIL TANK

Date Sampled: 11/12/96
Sample Matrix: OIL

Method	Analyte	Result	Q	Units	Reporting Limit	Analyst	Date Analyzed	Date Prepared
3040/7060	ARSENIC	<0.40		mg/kg	0.40	JH	01/30/97	
3040/7130	CADMIUM	<1.0		mg/kg	1.0	JH	01/29/97	
3040/7190	CHROMIUM	<5.0		mg/kg	5.0	JH	01/28/97	
3040/7420	LEAD	6.0		mg/kg	5.0	JH	01/29/97	
3040	DISSOLUTION PROCEDURE FOR METALS	0.000				JH	01/29/97	

CERTIFICATION: All analytical data reported above were obtained using the specified methods and were validated by our laboratory quality control system. This laboratory follows an approved quality assurance program.

Respectfully submitted:

Francis Y. Huang, Ph.D. / Henry N. Ashby
Lab Director / President

FP >230 °F
TOX 332

P.O. Box 468 • 8 East Tower Circle • Ormond Beach, Florida 32175-0468
(904) 672-5668 • Fax (904) 673-4001

PAGE.008 JUL 15 '97 14:50 FROM SEMINOLE-HQ-2

BEST AVAILABLE COPY

SOUTH USED OIL TANK

MR. WALT EGAN
SEMINOLE ELECTRIC COOPERATIVE
P.O. BOX 1577
PALATKA, FL 32178

Drinking Water
HRS #43160
Environmental
HRS #E83079
ENVIROLAB

ANALYTICAL REPORT

Submission Number: 9702000279
Date Received: 02/14/97
Date Reported: 03/13/97

Client's P.O. Number:
Project Number:
Project Name: SOUTH USED OIL TANK

Lab Sample Number: 9702279 1
Client Sample Number: 97-101
Sample Description: SOUTH USED OIL TANK

Date Sampled: 02/14/97
Sample Matrix: OIL

Method	Analyte	Result	Q	Unit	Reporting Limit	Analyst	Date Analyzed	Date Prepared
3040/7060	ARSENIC (Total)	<0.40		mg/kg	0.40	JB	02/19/97	
3040/7130	CADMIUM (Total)	<1.0		mg/kg	1.0	AH	02/21/97	
3040/7190	CHROMIUM (Total)	<5.0		mg/kg	5.0	MR	03/12/97	
3040/7190	LEAD (Total)	<5.0		mg/kg	5.0	AH	02/21/97	
3040	DISSOLUTION PROCEDURE FOR METALS	0.000				AH	02/21/97	

CERTIFICATION: All analytical data reported above were obtained using the specified methods and were validated by our laboratory quality control system. This laboratory follows an approved quality assurance program.

Respectfully submitted:

Francis Y. Huang, Ph.D. / Henry N. Ashby
Lab Director / President

P.O. Box 468 • 8 East Tower Circle • Ormond Beach, Florida 32175-0468
(904) 672-5868 • Fax (904) 673-4001

BEFORE THE STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

In Re: Seminole Electric Cooperative, Inc)		
Seminole Power Plant	)	DER CASE NO.PA 78-10F
Modification of Conditions	)	
of Certification	)	
Putnam County, Florida	)	
	)	

FINAL ORDER MODIFYING CONDITIONS OF CERTIFICATION

On October 19, 1979, the Governor and Cabinet, sitting as the Siting Board, issued a final order approving certification for the Seminole Electric Cooperative, Inc. Seminole electrical power plant site. That certification order approved the construction and operation of a 1240 MW, coal-fired power plant and associated facilities located in Putnam County, Florida.

On November 11, 1996, January 7, January 10, and January 29, 1997, Seminole Electric (SECI) filed requests to amend the conditions of certification pursuant to Section 403.516(1)(b), Florida Statutes. SECI requested that the conditions be modified to allow the burning of petroleum coke as a supplementary fuel.

Copies of SECI's proposed modifications were made available for public review. On both November 29, 1996, and February 21, 1997, a Notice of Proposed Modification of Power Plant Certification was published in the Florida Administrative Weekly. As of March 13, 1997, all parties to the original proceeding had received copies of the intent to modify. The notices specified that a hearing would be held if a party to the original certification hearing objects within 45 days from receipt of the proposed modifications or a person not otherwise a party objects in writing within 30 days after issuance of the public notice. As of April 21, 1997, no written objection to the proposed modifications had been received by the Department. Accordingly, in the absence of any timely objection,

IT IS ORDERED:

The proposed changes to the SECI Seminole Power Plant as described in the November

11, 1996, January 7, January 10, and January 29, 1997, requests for modification are **APPROVED**.

Pursuant to Section 403.516(1)(b), F.S., the conditions of certification for the Seminole Power Plant, are **MODIFIED** as follows:

I. A. Emission Limitations

2. Stack emissions from Units 1 and 2 shall comply with the following conditions when burning a mixture of coal and petroleum coke:

2.a. SO_2 Sulfur Dioxide Emissions

Unit 1: $E_{SO2} = [(\%C_{HI}/100)*(P_S)*(1-(\%R_0/100))] \div [(1-(\%C_{HI}/100))*(0.74 \text{ lb } SO_2/\text{MMBtu})]$ (Eqn. 1)

Unit 2: $E_{SO2} = [(\%C_{HI}/100)*(P_S)*(1-(\%R_0/100))] \div [(1-(\%C_{HI}/100))*(0.72 \text{ lb } SO_2/\text{MMBtu})]$ (Eqn. 2)

$\%C_{HI}$ = percent of coal 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

$\%R_0$ = overall percent SO_2 reduction from Equation 19-21 of EPA Reference Method 19. Per NSPS Subpart Da, $\%R_0$ must not be less than 90%, 30-day rolling average

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

2.b. Nitrogen oxide emissions:

i. 0.60 lb. per million Btu heat input, and 35 percent of the potential combustion concentration (65 percent reduction). Compliance with the lb. per million Btu heat input emission limitation and percent reduction requirement shall be determined on a 30-day rolling average basis. Compliance with the 0.60 lb. per million Btu heat input emission limitation shall also constitute compliance with the 65 percent reduction requirement; and

ii. 0.50 lb. per million Btu 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 petcoke is burned.

2.c. Particulate Matter Emissions

0.03 lb. per million Btu heat input, and 1 percent of the potential combustion concentration (99 percent reduction). Compliance with the 0.03 lb. per million Btu heat input emission limitation shall also constitute compliance with the 99 percent reduction requirement.

2.d. Carbon Monoxide Emissions

The permittee shall maintain and submit to the Department, on an annual basis for a period of five years from the date the units begin firing petroleum coke, test results demonstrating that the operational changes did not result in a significant emissions increase of the pollutant when compared to the past actual coal levels. The carbon monoxide emissions shall be based on test results using EPA Method 10.

2.e. Sulfuric Acid Emissions

The permittee shall maintain and submit to the Department on an annual basis for a period of five years from the date the units begin firing petroleum coke, test results demonstrating that the operational changes did not result in a significant emissions increase of the pollutant when compared to the past actual coal levels. The sulfuric acid mist emissions shall be based on test results using EPA Method 8.

2.f. Fuel Specifications

Fuels fired shall consist of coal and petroleum coke blends containing a maximum of 30 percent petroleum coke by weight. The maximum weight of the petroleum coke burned shall not exceed 186, 000 pounds per hour (averaged over 24 hours). The petroleum coke sulfur content shall not exceed 7.0 percent by weight, dry basis.

3. and 4. No Change

5. Handling of Petroleum Coke

All prior conditions of approval that address coal handling shall also apply to the handling of petroleum coke.

6. For the Electric Utility Steam Generating Units When Burning No 2 Fuel Oil Use of No. 2 Fuel oil is authorized for startups, flame stabilization and required emergency electric reserve capacity. It is also authorized for normal continuous operation when coal quality, process conditions, and/or burner equipment prevent meeting demand with solid fuels only.

D. Reporting

1.-3. No Change

4. Documentation verifying that the coal and petroleum coke fuel blends combusted in Units 1 and 2 have not exceeded the 30 percent maximum petroleum coke by weight limit specified by Condition of Approval, Section D., Item 6 shall be maintained and submitted to the Department's Northeast District Office with each annual report.

5. The Permittee shall maintain and submit to the Department, on an annual basis for a period of five years from the date the units begin firing petroleum coke, data demonstrating that the operational changes associated with the use of petroleum coke did not result in a significant emission increase pursuant to Rule 62-10.2000(12)(d), F.A.C.

XII. FGD/Sludge Landfill and Coal Pile.

SECI is authorized, pursuant to § 62-701.320(1), F.A.C., to utilize flyash from the Seminole Power Plant and from other coal fired electric generating facilities in the on-site FGD sludge stabilization process.

Adequate geophysical testing of landfill increments 1 and 2 and any subsequent increments shall be conducted in accordance with Chapter 62-701, F.A.C.

The existing and proposed FGD landfill areas shall be monitored and studied ----.

XXV. Modification of Conditions

The conditions of this certification may be modified in the following manner:

A. No change.

B. This certification shall be automatically modified to conform to any subsequent

amendments, modifications, or renewals made by DEP under a federally delegated or approved program to any separately issued Prevention of Significant Deterioration (PSD) permit, Title V Air Permit, or National Pollutant Discharge elimination System (NPDES) permit for the certified facility. SECI shall send each party to the original certification proceedings (at the party's last known address as shown in the record of such proceeding) notice of requests submitted by SECI for modifications or renewals of the above listed permits if the request involves a relief mechanism (e.g., mixing zone, variance, etc.) from state standards, a relaxation of conditions included in the permit due to state permitting requirements, or the inclusion of less restrictive air emission limitations in the air permits. DEP shall notify all parties to the certification proceeding of any intent to modify conditions under this section prior to taking final agency action.

C. All other modifications shall be made in accordance with Section 403.516, Florida Statutes.

Any party to this Notice has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, Mail Station 35, 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 of Appeal must be filed within 30 days from the date that the Final Order is filed with the Department of Environmental Protection.

DONE AND ENTERED this 9TH day of MAY, 1997 in Tallahassee, Florida.

STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION

for VIRGINIA B. WETHERELL
SECRETARY
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
(904) 488-1554

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk — Date: 5/12/97

I HEREBY CERTIFY that a copy of the foregoing was sent by U.S.Mail to the following this 15th day of ~~April~~ May, 1997.

James S. Alves
Hopping Green Sams & Smith
P.O. Box 6526
Tallahassee, FL 32314

David Jordan
Senior Attorney
Dept. of Community Affairs
2740 Centerview Drive
Tallahassee, FL 32399-0450

Thornton J. Williams, Esq.
Assistant General Counsel
Department of Transportation
Haydon Burns Building
605 Suwannee Street, M.S. 58
Tallahassee, FL 32399-0450

Division of Legal Services
Florida Public Service Commission
Gerald Gunter Building
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850

James Antista
General Counsel
Game and Fresh Water Fish Comm.
Bryant Bldg.
620 S. Meridian Street
Tallahassee, FL 32399-1600

Bob Elias, Esq.
Public Service Commission
Gerald Gunter Building
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dan Stengle, Esq.
Department of Community Affairs
2740 Centerview Drive
Tallahassee, FL 32399-2100

Charles Harwood
Executive Director
Withlacoochee Regional Planning Council
1241 SW Tenth Street
Ocala, FL 34474-2798

Charles Justice
Executive Director
No. Central FL Planning Council
2009 NW 67th Place
Gainesville, FL 32606

Brian Teeple
Executive Director
NE FL Regional Planning Council
9143 Phillips Hwy., Suite 350
Jacksonville, FL 32256

Samuel Taylor
Board of Co. Comm.
Putnam County
Post Office Box 758
Palatka, FL 32178

Lynne C. Capehart, Esq.
1601 NW 35th Way
Gainesville, FL 32605

Henry Dean
Executive Director
St. Johns River Water Management District
Post Office Box 1429
Palatka, FL 32178

Gordon B. Johnston
Marion County Attorney
601 SE 25th Avenue
Ocala, FL 34471

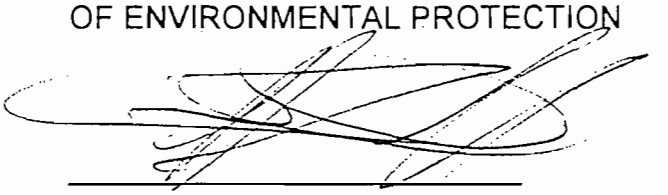
Jim Knox, Chairman
Board of Co. Comm.
Columbia Co. Courthouse
Post Office Drawer 1529
Lake City, FL 32056

Patrick Gilligan
City of Ocala
7 E Silver Springs Blvd.
Suite 405
Ocala, FL 34471

Mark Scruby
Clay Co. Attorney
Post Office Box 1366
Green Cove Springs, FL 32043

Honorable William A. Wilkes
825 N Orange Avenue
Post Office 1867
Green Cove Springs, FL 32043

STATE OF FLORIDA, DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Charles T. (Chip) Collette
Assistant General Counsel

State of Florida
Department of Environmental Protection
3900 Commonwealtn Boulevard, MS 35
Tallahassee, FL 32399-3000
(904) 921-9704

Best Available Copy

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In Re:	)
	)
Seminole Electric Cooperative, Inc.	)
Seminole Power Plant	)
Power Plant Certification	)
Modification Request	)
No. PA 78-10	)
Putnam County, Florida	)
	)

FINAL ORDER MODIFYING CONDITIONS
OF CERTIFICATION

On August 29, 1990, Seminole Electric Cooperative, Inc. submitted a request to modify the Conditions of Certification for the Seminole Power Plant relating to the construction and operation of a rail car maintenance and surface coating facility at the Seminole Power Plant site. The requested modification was submitted pursuant to Section 403.516, F.S., to the Department and parties to the original 1978-1979 certification proceedings.

On November 9, 1990, a Notice of Request for Modification of Power Plant Certification was served on all parties with a provision that a hearing would be held if requested on or before December 24, 1990. No hearing was requested. No party has objected to the proposed modification:

THEREFORE, IT IS ORDERED:

The Department hereby modifies the Conditions of Certification for the Seminole Power Plant as follows:

Condition XXVI. is added as follows:

XXVI. Rail Car Maintenance Facility

The rail car maintenance and surface coating facility shall be designed, constructed and operated in conformance with chapters 17-2, 17-25, and 17-302, F.A.C. and the following limitations:

A. Visible Emissions - shall not exceed 20% opacity.

B. VOC Emissions - shall not exceed 37.7 lbs/hr. or 7.84 T/year.

C. Particulate Emissions - Unconfined particulate emissions from abrasive blasting shall be controlled as required by Section 17-2.610(3)(c), F.A.C., using the

following precautions:

1. Only the interior of the railcars shall be cleaned.

2. The cover and the partial enclosure of the shelter will act as a windbreak to minimize the amount of residual particulate that becomes airborne.

D. Stormwater Runoff - shall be collected in existing runoff ditches and routed to percolation/evaporation areas on site.

E. Wastewater - There shall be no discharge of wastewater form the maintenance facility site.

F. sanitary Waste - Shall be disposed of in accordance with the applicable substantive requirements of chapter 10D-6, F.A.C.

G. Water - The associated drinking water system shall comply with the substantive requirements of chapters 10-D-4, 17-550 and 17-555, F.A.C. consumptive use of groundwater shall be governed by the non-procedural provisions of 40C-2.381, F.A.C. and Section 18.0.1, Part III, "Applicants Handbook consumptive Uses of Water."

NOTICE OF RIGHTS

Any party to this Order has the right to seek judicial review of this Order pursuant to Section 120.68, Florida Statutes by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of the General counsel, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the appropriate filing fees with the appropriate district court of appeal. The Notice of Appeal must be filed within 30 days from the date of the Final Order is filed with the clerk of the Department.

DONE AND ORDERED this 26 day of March, 1991, in Tallahassee, Florida

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

CAROL M. BROWNER
SECRETARY

Certificate of Service

I hereby certify that a copy of the petition of Modification of the Seminole Power Plant Site Certification was sent to the following parties by United States mail on March 26, 1991.

Ms. Kathryn Funchess
Deputy General Counsel
Department of Community Affairs
2740 Center View Drive
Tallahassee, FL 32399-2100

Mr. Brian Teeple
Northeast Florida Regional Planning Council
8649 Baypine Road, #110
Jacksonville, FL 32256

Mr. Michael Palecki
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32314

Mr. Samuel Taylor
Board of County Commissioners
Putnam County
P.O. Box 758
Palatka, FL 32178

Mr. Jim Alves
Hopping Boyd Green & Sams
P.O. Box 6526
Tallahassee, FL 32314

Ms. Lynne C. Capehart
1601 N.W. 35th Way
Gainesville, FL 32605

Ms. Susan Clark
Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Mr. Henry Dean
Executive Director
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178

Mr. G. Steven Pfeiffer
Department of Community Affairs
2740 Centerview Drive
Tallahassee, FL 32399-2100

Mr. Stephen P. Lee
Marion County Attorney
601 S.E. 25th Avenue
Ocala, FL 32671

Mr. Charles Harwood
Withlacoochee Regional Planning Council
1241 S.W. Tenth Street
Ocala, FL 32674

Mr. Thornton J. Williams
Department of Transportation
605 Suwannee Street
Mail Station #58
Tallahassee, FL 32399-0450

Mr. Charles F. Justice
North Central Florida Regional Planning Council
235 South Main Street
Suite 205
Gainesville, FL 32601

Mr. Ludie Shipp, Chairman
Board of County Commissioners
Columbia County Courthouse
P.O. Drawer 1529
Lake City, FL 32055

Mr. Don Wright
Board Counsel
St. Johns River Water
Management District
P.O. Box 2828
Orlando, FL 32802

Mr. Mark Scruby
Clay County Attorney
P.O. Box 1366
Green Cove Springs, FL 32043

Mr. Marvin Pritchett,
Chairman
Board of County Commissioners
Union County
P.O. Box 311
Lake Butler, FL 32054

Mr. William Phelan
City Attorney
City of Ocala
101 S.W. Third Street
Ocala, FL 32670

Mr. Maxie Carter, Jr.,
Board of County Commissioners
Bradford County
P.O. Drawer B
Starke, FL 32091

The Honorable Gerald T. Whitt
City of Lake City
P.O. Box 1687
Lake City, FL 32055

Mr. W.W. Jerenign, Chairman
Board of County Commissioners
Suwannee County Courthouse
200 South Ohio Avenue
Live Oak, FL 32060

Mr. Jerry Scarborough
Executive Director
Suwannee River Water Management
District
Route 3, Box 64
Live Oak, FL 32060

Hamilton S. Oven, Jr.

for Richard Donelan
Assistant General Counsel

State of Florida Department
of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

BEST AVAILABLE COPY

State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10

CONDITIONS OF CERTIFICATION

I. Air

The Construction and operation of Units No. 1 and 2 at the Seminole steam electric power plant site shall be in accordance with all applicable provisions of Chapters 17-2, 17-5 and 17-7, Florida Administrative Code. In addition to the foregoing, the permittee shall comply with the following conditions of certification:

A. Emission Limitations

1. Stack emissions from Units 1 and 2 shall not exceed the following when burning coal:

   a. SO_2 - 1.2 lb. per million BTU heat input, maximum two hour average.

   b. NO_x - 0.60 lb. per million BTU heat input.

   c. Particulates - 0.03 lb. per million BTU heat input.

2. The height of the boiler exhaust stack for Units No. 1 & 2 shall not be less than 675 ft. above grade.

3. Particulate emissions from the coal handling facilities:

   a. The applicant shall not cause to be discharged into the atmosphere from any coal processing or conveying equipment, coal storage system or coal transfer and loading system processing coal, visible emissions which exceed 20 percent opacity. Particulate emissions shall be controlled by use of control devices having a removal efficiency of not less than 99.9%.

   b. The applicant must submit to the Department within ten (10) working days after it becomes available, copies of technical data pertaining to the selected particulate emissions control for the coal handling facility. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of such device if the Department determines the selected control device to be inadequate to meet the emission limits specified in 3(a) above. Such disapproval shall be issued within 30 days of receipt of the technical data.

4. Particulate emissions from the FGD sludge fixing facility shall be in compliance with Section 17-2.05(2).

Best Available Copy

B. Air Monitoring Program

1. The permittee shall install and operate continuously monitoring devices for the Units No. 1 & 2 boiler exhausts for sulfur dioxide, nitrogen dioxide and opacity. The monitoring devices shall meet the applicable requirements of Section 17-2.08, FAC. The opacity monitor may be placed in the duct work between the electrostatic precipitator and the FGD scrubber.

2. The permittee shall operate the two ambient monitoring devices for sulfur dioxide as generally shown on Figure 1. in accordance with EPA reference methods in 40 CFR, Part 53 and two ambient monitoring devices for suspended particulates as generally shown on Figure 1. The monitoring devices shall be specifically located at a location approved by the Department. The frequency of operation shall be every six days commencing as specified by the Department.

3. The permittee shall maintain a daily log of the amounts and types of fuels used and copies of fuel analyses containing information on sulfur content, ash content and heating values.

4. The permittee shall provide sampling ports into the stack and shall provide access to the sampling ports, in accordance with DER Publication, Standard Sampling Techniques and Methods of Analysis for the Determination of Air Pollutants from Point Source, July 1975.

5. The ambient monitoring program may be reviewed annually beginning two years after start-up of Unit No. 2 by the Department and the permittee.

6. Prior to operation of the source, the applicant shall submit to the Department a standardized plan or procedure that will allow the applicant to monitor emission control equipment efficiency and enable the applicant to return malfunctioning equipment to proper operation as expeditiously as possible.

C. Stack Testing:

1. Within 60 calendar days after achieving the maximum capacity at which each unit will be operated, but no later than 180 operating days after initial startup, the owner or operator shall conduct performance tests for particulates and SO_2 and furnish the Department a written report of the results of such performance tests.

2. Performance tests shall be conducted and data reduced in accordance with methods and procedures in accordance with DER's Standard Sampling Techniques and Methods of Analysis for Determination on Air Pollutants from Point Sources, July 1975.

Best Available Copy

3. Performance tests shall be conducted under such conditions as the Department shall specify based on respresentative performance of the facility. The owner or operator shall make available to the Department such records as may be necessary to determine the conditions of the performance tests.

4. The owner or operator shall provide 30 days prior notice of the performance tests to afford Department the opportunity to have an observer present.

5. Stack tests for particulates and SO_2 shall be performed annually in accordance with conditions C. 2, 3, and 4 above.

D. Reporting

1. For each Unit, stack monitoring, fuel usage and fuel analysis data shall be reported to the Department on a quarterly basis commencing with the start of commercial operation in accordance with 40 CFR, Part 60, Section 60.7., and in accordance with Section 17-2.08, FAC.

2. Ambient air monitoring data shall be reported to the Department quarterly commencing on the date of certification by the last day of the month following the quarterly reporting period utilizing the SAROAD or other format approved by the Department in writing.

3. Beginning one month after certification the applicant shall submit to the Department a quarterly status report briefly outlining progress made on engineering design and purchase of major pieces of equipment (including control equipment). All reports and information required to be submitted under this condition shall be submitted to the Administrator of Power Plant Siting, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

II. Water Discharges

Any discharges into any waters of the State during construction and operation of Units No. 1 & 2 shall be in accordance with all applicable provisions of Chapter 17-3, Florida Administrative Code and 40 CFR, 423, Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category except as provided herein. Also the permittee shall comply with the following conditions of certification:

A. Plant Effluents and Receiving Body of Water

For discharges made from the power plant the following conditions shall apply.

BEST AVAILABLE COPY

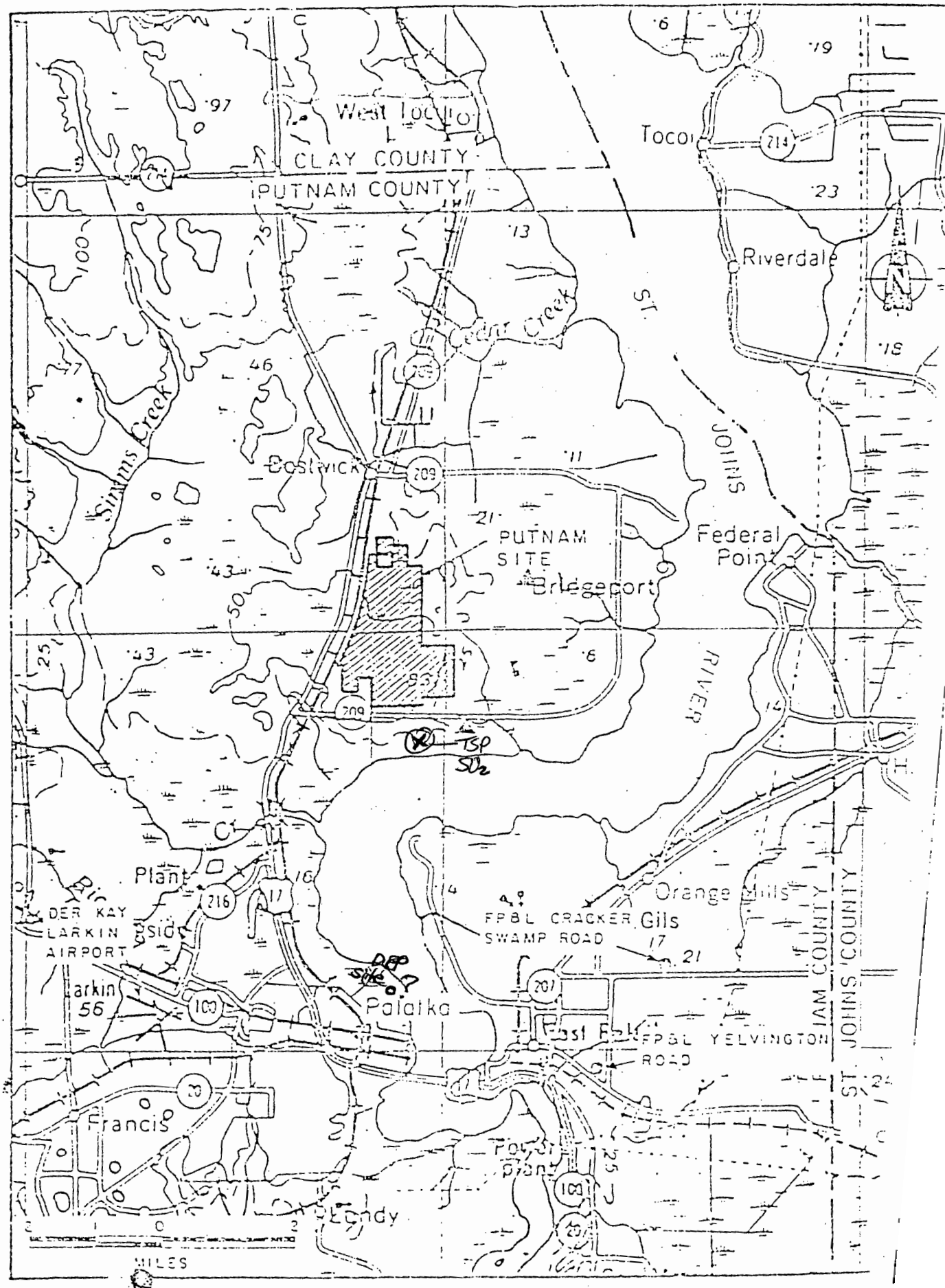


Figure [illegible]. Location of Ambient Air Quality Monitoring Stations.

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

RECEIVED
JUN 17 1996
BUREAU OF
AIR REGULATION

June 13, 1996

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. John C. Brown, Jr., P.E.
Administrator, Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
JUN 17 1996
BUREAU OF
AIR REGULATION

Re: Seminole Power Plant
Title V Permit Application

Dear Mr. Brown:

Seminole Electric Cooperative, Inc. (SECI) operates a nominal 1,360 megawatt (MW) electric generation facility located in Palatka, Putnam County, Florida. The Seminole Power Plant consists of two steam boilers (Unit Nos. 1 and 2), two steam turbines, a recirculating cooling water system, coal, limestone, fly ash, bottom ash, and flue gas desulfurization (FGD) sludge stabilization facilities, fuel oil storage tanks, water treatment facilities, railcar maintenance, and ancillary support equipment.

The Seminole Power Plant qualifies as a Title V Source pursuant to Chapter 62-210.200(173), Florida Administrative Code (F.A.C.) , because potential emissions of a regulated air pollutant exceed 100 tons per year. Four copies of an application package constituting SECI's Title V permit application for the Seminole Power Plant are enclosed to satisfy the requirements of Chapter 62-213.420, F.A.C.

Please contact Ken Bachor or me at (813) 963-0994 if there are any questions regarding this application.

Sincerely,

M. P. Opalinski

M. P. Opalinski
Director of Environmental Affairs

dc
Enclosure

16313 NORTH DALE MABRY HIGHWAY • P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

TELECOPIER COVER LETTER

Date: 7-16-97

Total Number of Pages including cover letter: 4

To: Ed Svec

Company: FDEP

Phone or Telecopier #: (850) 922-6979

From: Mike Roddy

If you do not receive all of the pages, please call copy room X1282.

Comments:

P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994
• FAX (813) 264-7906 •

0698 Rev. 1/90

JUL 16 '97 14:27 FROM SEMINOLE-HQ-2 PAGE.001

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

July 16, 1997

Mr. Ed Svec
Florida Department of Environmental Protection
Mail Station 5505
2600 Blairstone Rd.
Tallahassee, Fl 32399-2400

RE: Seminole Power Plant
Title V Operation Permit Application
Request for Additional Information

Dear Mr. Svec:

Based on our recent phone conversation I am faxing you D. Segment (Process/Fuel) Information forms for No.2 fuel oil usage. Please note that the calculations used for the forms were reviewed by Seminole Electric's P.E. of record (Mr. Tom Davis-ECT). A complete package will be sent to you within approximately 10 days and will include the following items:

- Application Contract Form
- Authorized Representative Form
- Professional Engineer Statement
- D. Segment (Process/Fuel) Information Forms for No.2 oil
- No. 2 Oil Analysis Sheet
- Used Oil Analysis Sheets (indicating "on-spec." compliance)

The above items will be sent in hard copy along with a disc to update the original application.

If you have any questions or require any additional information to be faxed prior to the complete package submittal, please give me a call at (813) 963-0994.

Sincerely,

Mike Roddy
Environmental Engineer

16313 NORTH DALE MABRY HIGHWAY • P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994

JUL 16 '97 14:28 FROM SEMINOLE-HQ-2 PAGE.002

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Steam Electric Generator No. 1

Segment Description and Rate : Segment 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : No. 2 fuel oil used for startups, flame stabilization, and reserve capacity.	
2. Source Classification Code (SCC) : 1-01-005-01	
3. SCC Units : Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate : 3.32	5. Maximum Annual Rate : 1,664.20
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.50	8. Maximum Percent Ash : 0.01
9. Million Btu per SCC Unit : 136	
10. Segment Comment :	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Steam Electric Generator No. 2

Segment Description and Rate : Segment 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : No. 2 fuel oil used for startups, flame stabilization, and resevere capacity.			
2. Source Classification Code (SCC) : 1-01-005-01			
3. SCC Units : Thousand Gallons Burned (all liquid fuels)			
4. Maximum Hourly Rate :	3.32	5. Maximum Annual Rate :	1,664.20
6. Estimated Annual Activity Factor :			
7. Maximum Percent Sulfur :	0.50	8. Maximum Percent Ash :	0.01
9. Million Btu per SCC Unit :	136		
10. Segment Comment :			

Appendix H-1, Permit History/ID Number Changes

Seminole Electric Cooperative, Inc.

[DRAFT/PROPOSED/FINAL]Permit No.: 1070025-001-AV
Facility ID No.: 1070025

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)
-001	#1 Unit, W/ESP AND FGD	PA78-10/PSD-FL-018	09/18/79			10/12/88, 8/10/89
-002	#2 Unit, W/ESP AND FGD	PA78-10/PSD-FL-018	09/18/79			10/12/88, 8/10/89
-003	Railcar Maintenance	PA78-10/PSD-FL-018	09/18/79			10/12/88, 8/10/89
-004	Coal Storage Yard	PA78-10/PSD-FL-018	09/18/79			10/12/88, 8/10/89

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.**: 31JAX540025

To: **Facility ID No.**: 1070025

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

File

Florida Department of

Memorandum — Environmental Protection

TO: Chris Kirts, NED

FROM: Bruce Mitchell

DATE: June 10, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Seminole Electric Cooperative, Putnam Plant: 1070025-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by July 10, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Ed Svec, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bjb

cc: Bob Leech

6/10/97 cc: Ed Svec
Reading File

Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

August 7, 1996

Mr. Michael Opalinski
Director, Environmental Affairs
Seminole Electric Cooperative, Inc.
Post Office Box 272000
Tampa, Florida 33688-2000

Dear Mr. Opalinski:

Putnam County - Stationary Air Emission Sources
Seminole Electric Cooperative, Inc.
AIRS No. 1070025
Addendum to Compliance Report for May 15,1996 Inspection

On August 5, 1996, Brenda Shiver contacted the Department to request a wording change to the above mentioned report. She had requested that the second comment under Section VII of the report be modified to delete the word "Unpermitted" from the beginning of the statement. Ms. Shiver stated that SECI believed that the limestone unloading area and silos mentioned in the inspection report are included in the facility's current State Site Certification and thus permitted. After extensive review of the documentation on file here in the Northeast District, the Compliance Section can find no mention of any air emission sources other than Unit1, Unit 2, the Railcar Maintenance facility, and the Coal Storage Yard. The Department has no objection, however, in granting the wording modification Ms. Shiver requested with the understanding that the stationary air emission sources noted in the inspection, as well as any other stationary air emission sources, whether mentioned in the facility's current State Site Certification or not, should be included in the Title V permit application if required.

This section is continuing to investigate if these sources are included in the Certification and would appreciate any comments and interpretation that SECI might have. If I may provide any additional information, please contact me at (904)448-4310, extension 243. Thank you for your continued cooperation.

Sincerely,

Michael T. Dunbar
Northeast District
Air Program

xc: Bruce Mitchell, FDEP w/ report
Brenda Shiver, SECI

MTD

fil 7/29

Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

July 25, 1996

Mr. Michael Opalinski
Director, Environmental Affairs
Seminole Electric Cooperative, Inc.
Post Office Box 272000
Tampa, Florida 33688-2000

Dear Mr. Opalinski:

Putnam County - Stationary Air Emission Sources
Seminole Electric Cooperative, Inc.
AIRS No. 1070025
Level III Compliance Inspection on May 15, 1996

A compliance inspection of the above mentioned facility was performed by Department personnel the date indicated. We greatly appreciate the time and courtesy taken by the facility staff in accommodating us during the inspection.

A copy of the completed Air Compliance Inspection Report detailing items and issues found during the inspection is enclosed for your records. The Report also includes what corrective actions, if any, are required with corresponding time frames.

Should you have any questions or comments related to the inspection or the Report, please contact me at (904)448-4310, extension 243. Thank you for continued cooperation and assistance.

Sincerely,

Michael T. Dunbar
Northeast District
Air Program

xc: Hamilton Oven, FDEP
Carol Swiger, SECI

MTD
Enclosure

State of Florida
Department of Environmental Protection
Northeast District
Air Program
Air Compliance Inspection Report

I. Facility and Inspection Information

Facility Name: Seminole Electric Cooperative, Inc.		AIRS ID: 1070025
Site Location/Directions: US 17 South of Green Cove Spring and north of Palatka on East side of Road		County: Putnam
		Entry Date: 5/15/96
Facility Phone No.:		Entry/Exit Times: 10:30 am / 12:30 pm
Primary Contact's Name: Carol Swiger	Title: Env. Assistant	Phone No.: (904) 328-4255
Primary Contact's Address: PO Box 1577, Palatka, FL 32178-1577		

Other Related Contact's	Title	Phone No.
Kenneth Bahor P.E. ESE	Mgr, Env. Licensing	(813) 963-0994

Permittee Name: Michael Opalinski	Title: Dir, Env. Affairs	Phone No.: (813) 963-0994
Permittee Address: PO Box 272000, Tampa, FL 33688-2000		

Inspection Type:	Stationary Source: ✓	Asbestos:	Open Burning:	General Permit:
Activity:	Routine Inspection: ✓	Source Testing: ✓	Compliant:	Other:
Inspection Level: III	Photos Taken?: Yes	Log Book Volume: AP-1	Page: 34	

II. Facility Compliance Areas Evaluated

S=Satisfactory M=Marginal U=Unsatisfactory Blank= not evaluated C= see Commments

S	1. Permit/SCC PA 78-10	S	7. Source/Controls Operation	C	13. Source Test
	2. Compliance Schedule	S	8. Source/Controls Maintenance		14. VE Test
S	3. Records and Reports	S	9. Source Emission		15. Source Test Results
S	4. CEMS Records	C	10. Unpermitted/Exempt Sources		16. Laboratory
S	5. CEMS Monitoring	S, C	11. Facility Site Review		17. Waste Mat'l
	6. AOR's	S	12. Fugitive Emissions		18. Other

Overall Compliance Status:

III. Facility Source Information

Inspected Source	Permit No.	Controls	Compliance Status
Unit #1 w/ controls	PA 78-10	ESP, FGD	S
Unit #2 w/ controls	"	ESP, FGD	S
Railcar maintenance	"	None	S, C
Coal Storage Yard	"	None	S

IV. Verification

Inspector	Signature	Date
Mike Dunbar	Michael D. Dunbar	7/25/96

Supervisor: Mat Benjamin Signature: [signature] Date:

V. Suggested Corrective Actions

(1) Please clean up excess grit from blasting area to prevent fugitive emissions around Railcar maintenance building

(2) Please make sure all unpermitted sources noted during the inspection (limestone unloading; silos) are mentioned in Title V application

VI. Notification to the Department from Facility

(V) Written notification concerning any corrections made is not required for this inspection.

( ) Written notification concerning corrective actions is required within ( ) days.

( ) Written schedule needed within ( ) days concerning:

- ( ) When construction will (start/ be completed).
- ( ) When compliance will be acheived.
- ( ) Other:

( ) Verbal notification is required once corrective actions are made.

( ) Verbal notification concerning corrective actions is required within ( ) days.

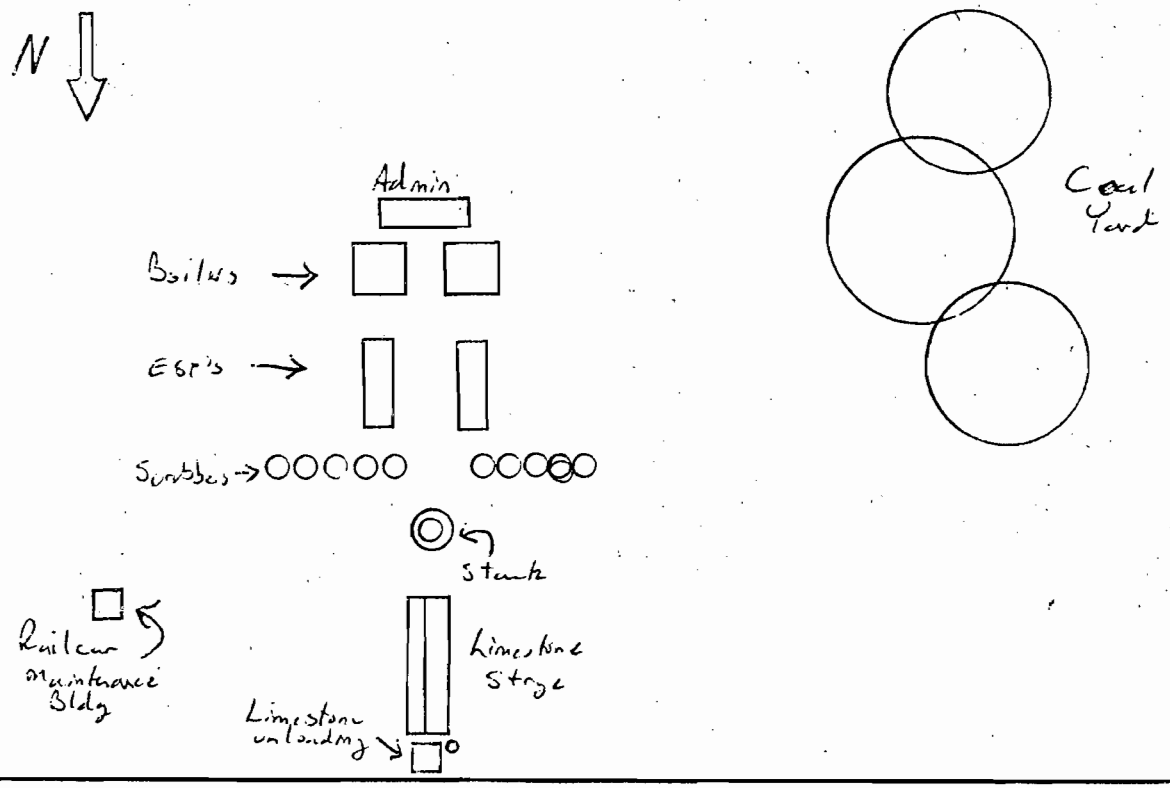
( ) A meeting with the facility is requested. Please contact ( )to arrange a meeting.

( ) Other:

VII. Comments

C - Source test observation not done due to lack of safety equipment
- Unpermitted sources noted during inspection - needs inclusion into Title V
- excess blast grit noted around Railcar maintenance Building

VII. Facility/Source Diagram



State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10
CONDITIONS OF CERTIFICATION

NORTHEAST DISTRICT
RECEIVED
FEB 18 1993
DER-JACKSONVILLE

Table of Contents

		Page
I.	Air	1
	A. Emission Limitations	2
	B. Air Monitoring Program	2
	C. Stack Testing	2
	D. Reporting	3
II.	Water Discharges	3
	A. Plant Effluents	3
	1. Receiving Body of Water	4
	2. Point of Discharge	4
	3. Thermal Mixing Zone	4
	4. Chemical Wastes and Boiler Blowdown	4
	5. Coal Pile and Limestone Pile	4
	6. Cooling Tower Blowdown	4
	7. Chlorine	5
	8. pH	5
	9. Polychlorinated Biphenyl Compounds	5
	10. Mixing Zones	5
	11. Variances	6
	12. Effluent Limitations	6
	B. Water Monitoring Program	7
	1. Chemical Monitoring	7
	~~2. Physical Monitoring~~	~~8~~
III.	Groundwater	
	A. General	8
	B. Well Criteria	8
	C. Water Use Restriction	8
	D. Emergency Shortages	8
	E. Monitoring and reporting	9
	F. Leachate	10
	1. Zone of Discharge	10
	2. Corrective Action	10
IV.	Control Measures During Construction	10
	A. Stormwater Runoff	10
	B. Sanitary Wastes	11
	C. Environmental Control Program	11
V.	Solid Wastes	11
VI.	Operation Safeguards	11
VII.	Screening	12
VIII.	Potable Water Supply System	12
IX.	Transformer and Electric Switching Gear	12
X.	Toxic, Deleterious, or Hazardous Materials	12
XI.	Construction in Waters of the State	12

XII. FGD/ Sludge Landfill and Coal Pile 13
XIII. Transmission Lines 14
XIV. Change in Discharge 15
XV. Noncompliance Notification 15
XVI. Facilities Operation 16
XVII. Adverse Impact 16
XVIII. Right of Entry 16
XIX. Revocation or Suspension 16
XX. Civil and Criminal Liability 17
XXI. Property Rights 17
XXII. Severability 17
XXIII. Definitions 17
XXIV. Review of Site Certification 17
XXV. Modification of Conditions 18

BEST AVAILABLE COPY

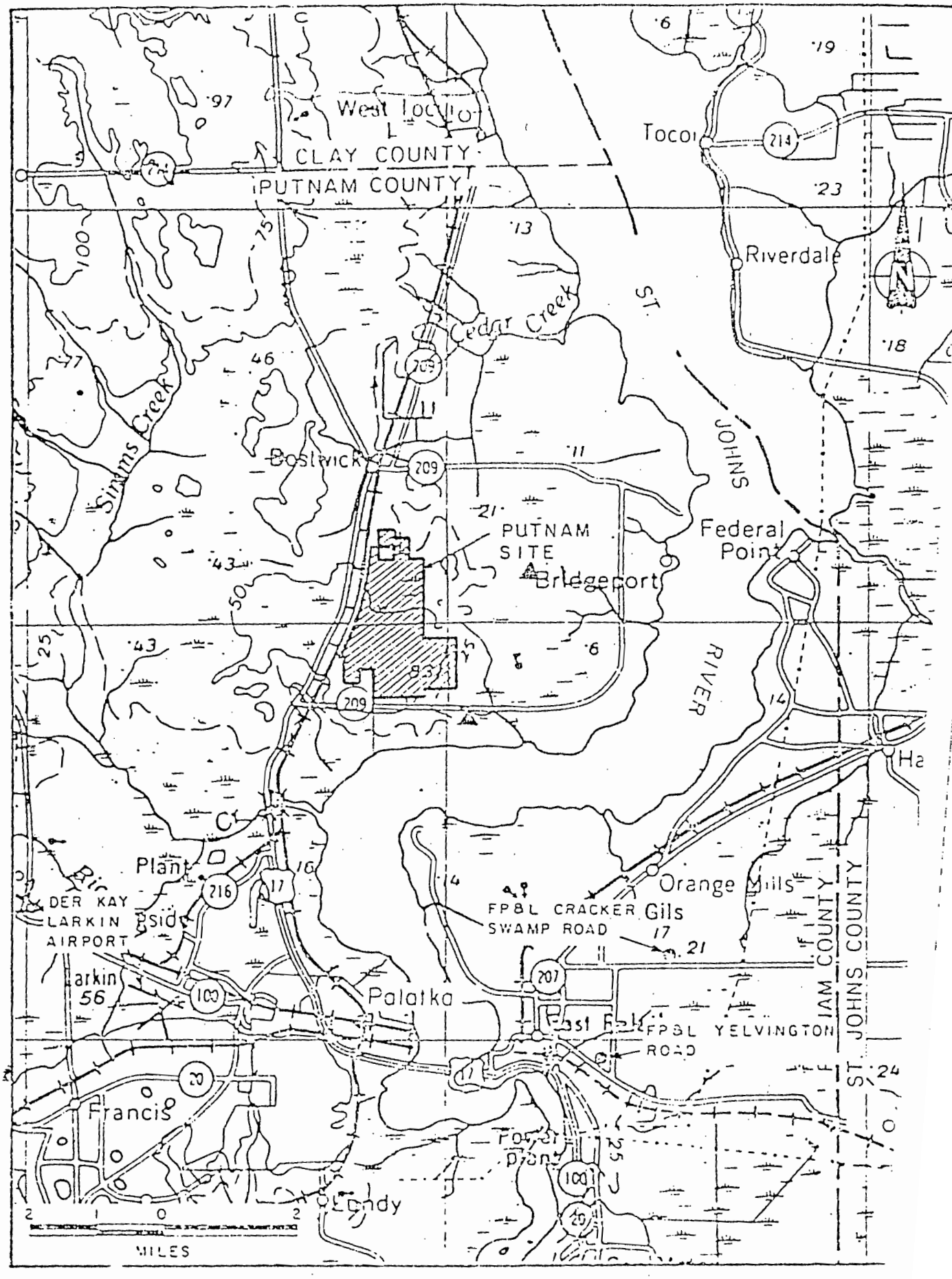


Fig. 1. Location of Ambient Air Quality Monitoring Stations.

State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10

CONDITIONS OF CERTIFICATION

I. Air

The Construction and operation of Units No. 1 and 2 at the Seminole steam electric power plant site shall be in accordance with all applicable provisions of Chapters 17-2, 17-5 and 17-7, Florida Administrative Code. In addition to the foregoing, the permittee shall comply with the following conditions of certification:

A. Emission Limitations

1. Stack emissions from Units 1 and 2 shall not exceed the following when burning coal:

   a. SO_2 - 1.2 lb. per million BTU heat input, maximum two hour average.

   b. NO_x - 0.60 lb. per million BTU heat input.

   c. Particulates - 0.03 lb. per million BTU heat input.

2. The height of the boiler exhaust stack for Units No. 1 & 2 shall not be less than 675 ft. above grade.

3. Particulate emissions from the coal handling facilities:

   a. The applicant shall not cause to be discharged into the atmosphere from any coal processing or conveying equipment, coal storage system or coal transfer and loading system processing coal, visible emissions which exceed 20 percent opacity. Particulate emissions shall be controlled by use of control devices having a removal efficiency of not less than 99.9%.

   b. The applicant must submit to the Department within ten (10) working days after it becomes available, copies of technical data pertaining to the selected particulate emissions control for the coal handling facility. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of such device if the Department determines the selected control device to be inadequate to meet the emission limits specified in 3(a) above. Such disapproval shall be issued within 30 days of receipt of the technical data.

4. Particulate emissions from the FGD sludge fixing facility shall be in compliance with Section 17-2.05(2).

B. Air Monitoring Program

1. The permittee shall install and operate continuously monitoring devices for the Units No. 1 & 2 boiler exhausts for sulfur dioxide, nitrogen dioxide and opacity. The monitoring devices shall meet the applicable requirements of Section 17-2.08, FAC. The opacity monitor may be placed in the duct work between the electrostatic precipitator and the FGD scrubber.

2. The permittee shall operate the two ambient monitoring devices for sulfur dioxide as generally shown on Figure 1. in accordance with EPA reference methods in 40 CFR, Part 53 and two ambient monitoring devices for suspended particulates as generally shown on Figure 1. The monitoring devices shall be specifically located at a location approved by the Department. The frequency of operation shall be every six days commencing as specified by the Department.

3. The permittee shall maintain a daily log of the amounts and types of fuels used and copies of fuel analyses containing information on sulfur content, ash content and heating values.

4. The permittee shall provide sampling ports into the stack and shall provide access to the sampling ports, in accordance with DER Publication, Standard Sampling Techniques and Methods of Analysis for the Determination of Air Pollutants from Point Source, July 1975.

5. The ambient monitoring program may be reviewed annually beginning two years after start-up of Unit No. 2 by the Department and the permittee.

6. Prior to operation of the source, the applicant shall submit to the Department a standardized plan or procedure that will allow the applicant to monitor emission control equipment efficiency and enable the applicant to return malfunctioning equipment to proper operation as expeditiously as possible.

C. Stack Testing:

1. Within 60 calendar days after achieving the maximum capacity at which each unit will be operated, but no later than 180 operating days after initial startup, the owner or operator shall conduct performance tests for particulates and SO_2 and furnish the Department a written report of the results of such performance tests.

2. Performance tests shall be conducted and data reduced in accordance with methods and procedures in accordance with DER's Standard Sampling Techniques and Methods of Analysis for Determination on Air Pollutants from Point Sources, July 1975.

3. Performance tests shall be conducted under such conditions as the Department shall specify based on respresentative performance of the facility. The owner or operator shall make available to the Department such records as may be necessary to determine the conditions of the performance tests.

4. The owner or operator shall provide 30 days prior notice of the performance tests to afford Department the opportunity to have an observer present.

5. Stack tests for particulates and SO_2 shall be performed annually in accordance with conditions C. 2, 3, and 4 above.

D. Reporting

1. For each Unit, stack monitoring, fuel usage and fuel analysis data shall be reported to the Department on a quarterly basis commencing with the start of commercial operation in accordance with 40 CFR, Part 60, Section 60.7., and in accordance with Section 17-2.08, FAC.

2. Ambient air monitoring data shall be reported to the Department quarterly commencing on the date of certification by the last day of the month following the quarterly reporting period utilizing the SAROAD or other format approved by the Department in writing.

3. Beginning one month after certification the applicant shall submit to the Department a quarterly status report briefly outlining progress made on engineering design and purchase of major pieces of equipment (including control equipment). All reports and information required to be submitted under this condition shall be submitted to the Administrator of Power Plant Siting, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

II. Water Discharges

Any discharges into any waters of the State during construction and operation of Units No. 1 & 2 shall be in accordance with all applicable provisions of Chapter 17-3, Florida Administrative Code and 40 CFR, 423, Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category except as provided herein. Also the permittee shall comply with the following conditions of certification:

A. Plant Effluents and Receiving Body of Water

For discharges made from the power plant the following conditions shall apply.

NORTHEAST DISTRICT
RECEIVED
NOV 23 1990
REGULATORY
DER-JACKSONVILLE

RAILCAR MAINTENANCE AND SURFACE COATING FACILITY

SEMINOLE POWER PLANT

Introduction

Seminole Electric Cooperative, Inc. (SECI) is proposing to construct a railcar maintenance and surface coating facility at the Seminole Power Plant located north of Palatka, Florida in Putnam County.

Periodically, it is necessary for SECI to perform scheduled maintenance on its fleet of 300 railcars. Typical maintenance activities will include air brake repairs, wheel changes, welding, abrasive blasting and resurface coating of railcar interiors. Presently, these repairs are being conducted by an outside contractor, however, a cost analysis performed by SECI indicates a significant annual cost savings will be realized with construction of this facility.

The proposed facility will be constructed on an existing rail spur on the east side of the Seminole plant site, approximately 2000 ft. from the nearest plant boundary and 5000 ft. from the nearest residence (fig. 1).

The facility will consist of two (2) open sided metal shelters 70 feet long, 30 feet wide and 26 feet high. The shelters will be constructed 100 feet apart. Each shelter will be 35 % open on each side and 100 % open on both ends to provide adequate ventilation. An office building with restroom facilities will also be constructed. Sanitary waste discharge will be to an adequately sized septic tank and percolation field. Water will be supplied by a well constructed near the office location. A small storage shed for storing primer and surface coating material will be built near the surface coating shelter.

Description of Process

A diagram of the proposed facility is included as Figure 2. The process consists of the following three steps:

Step One - Car Clean Out and Physical Repair

Each railcar has some residual coal that must be removed. This coal will be shoveled by hand into 55 gallon drums. These covered drums will be stored on an lined area and periodically transported to the coal pile. No water will be used in this process. After cleaning, mechanical maintenance will be performed. During these maintenance activities no oil, grease, lubricants, solvents or other regulated substances will be used.

Step Two - Abrasive Blasting

The railcars to be repaired have a corrosion resistant coating that must be replaced. The worn coating is removed by abrasive blasting. Fugitive particulate emissions from the blasting shelter will be reasonable confined as required by 17-2.610 (3)(C)(7)FAC. Only the interior of the cars will be cleaned. The cover and partial enclosure of the shelter will act as a windbreak to minimize the amount of residual particulate that becomes airborne.

Step Three - Surface Coating

After the worn surface coating has been removed, the railcar will be moved to the surface coating shelter. The interior of the car will be cleaned by hand to remove any residual sand. Actual spray coating of the railcar interior will be conducted for eight hours, one day per week. Emissions from surface coating are considered minor as defined by 17-2.500 (Table 500-2) (Table 500-3) and (Table 510-1).

During the construction of the facility a limited amount of earthwork will be done to level the area and provide an access road.

There will be no water used in the work to be performed at the proposed facility. Stormwater runoff will be collected in the runoff ditches and routed to the northern section of the plant site for percolation and evaporation. There will be no wastewater discharge from this facility.

State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10

CONDITIONS OF CERTIFICATION (Revised 8/10/89)

I. Air

The construction and operation of Units No. 1 and 2 at the Seminole steam electric power plant site shall be in accordance with all applicable provisions of chapters 17-2, 17-5 and 17-7, Florida Administrative Code. In addition to the foregoing, the permitte shall comply with the following conditions of certification:

A. Emission Limitations

1. Stack emissions from Units 1 and 2 shall not exceed the following when burning coal:

   a. SO_2 - 1.2 lb. per million Btu heat input, maximum two hour average.

   b. NO_x - 0.60 lb. per million Btu, 30 day rolling average.

   c. Particulates - 0.03 lb. per million Btu heat input.

2. The height of the boiler exhaust stack for units No. 1 & 2 shall not be less than 675 ft. above grade.

3. Particulate emissions from the coal handling facilities:

   a. The applicant shall not cause to be discharged into the atmosphere from any coal processing or conveying equipment, coal storage system or coal transfer and loading system processing coal, visible emissions which exceed 20 percent opacity. Particulate emissions shall be controlled by use of control devices having a removal efficiency of not less than 99.9%.

   b. The applicant must submit to the Department within ten (10) working days after it becomes available, copies of the technical data pertaining to the selected particulate emissions control for the coal handling facility. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review

State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10

CONDITIONS OF CERTIFICATION

I. Air

The construction and operation of Units No. 1 and 2 at the Seminole steam electric power plant site shall be in accordance with all applicable provisions of Chapters 17-2, 17-5 and 17-7, Florida Administrative Code. In addition to the foregoing, the permittee shall comply with the following conditions of certification:

A. Emission Limitations

1. Stack emissions from Units 1 and 2 shall not exceed the following when burning coal:

   a. SO_2 - 1.2 lb. per million BTU heat input, maximum two hour average.

   b. NO_x - 0.70 lb per million BTU heat input.

   c. Particulates - 0.30 lb. per million BTU heat input.

2. The height of the boiler exhaust stack for Units No. 1 & 2 shall not be less than 675 ft. above grade.

3. Particulate emissions from the coal handling facilities:

   a. The applicant shall not cause to be discharged into the atmosphere from any coal processing or conveying equipment, coal storage system or coal or coal transfer and loading system processing coal, visible emissions which exceed 20 percent opacity. Particulate emissions shall be controlled by use of control devices having a removal efficiency of not less than 99.9%.

   b. The applicant must submit to the Department within ten working days after

it becomes available, copies of technical data pertaining to the selected particulate emissions control for the coal handling facility. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of such device if the Department determines the selected control device to be inadequate to meet the emission limits specified in 3. a. above. Such disapproval shall be issued within 30 days of receipt of the technical data.

4. Particulate emissions from the FGD sludge fixing facility shall be in compliance with Section 17-2.05(2).

B. Air Monitoring Program

1. The permittee shall install and operate continuously monitoring devices for the Units No. 1 & 2 boiler exhausts for sulfur dioxide, nitrogen dioxide and opacity. The monitoring devices shall meet the applicable requirements of Section 17-2.660, F.A.C. and 40 C.F.R. 60. ~~Section 17-2.00.~~ The opacity monitor may be placed in the duct work between the electrostatic precipitator and the FGD scrubber.

2. The permittee shall operate an ~~the two~~ ambient monitoring devices for sulfur dioxide ~~as generally shown on Figure 1.~~ in accordance with EPA reference methods in 40 C.F.R., Part 53 and an ~~two~~ ambient monitoring devices for suspended particulates as ~~generally~~ shown on Figure 1. The monitoring device shall be specifically located at a location approved by the Department. The frequency of operation shall be every six days commencing as specified by the Department.

3. The permittee shall maintain a daily log of the amounts and types of fuels used and copies of fuel analyses containing information on

sulfur content, ash content and heating values.

4. The permittee shall provide sampling ports into the stack and shall provide access to the sampling ports in accordance with 17-2.700, Table 700-1 and 40 C.F.R. 60.8~~DER Publication, Standards Sampling Techniques and Methods of Analysis for the determination of Air Pollutants from Point Source, July 1975.~~

5. The ambient monitoring program may be reviewed annually beginning two year after start-up of Unit No. 2 by the Department and the permittee.

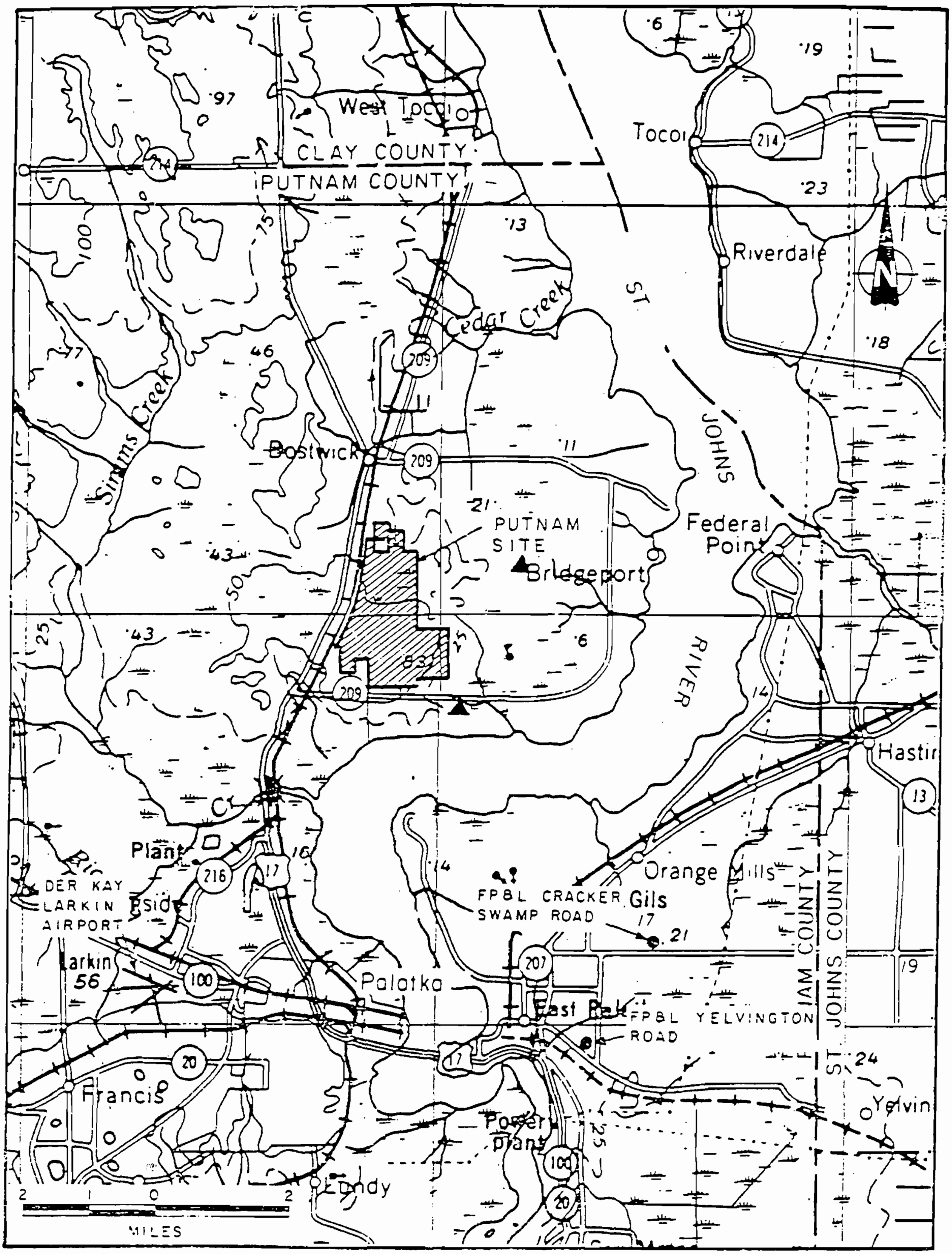
6. Prior to operation of the source, the applicant shall submit to the Department a standardized plan or procedure that will allow the applicant to monitor emission control equipment efficiency and enable the applicant to return malfunctioning equipment to proper operation as expeditiously as possible.

C. Stack Testing

1. Within 60 calendar days after achieving the maximum capacity at which each unit will be operated, but no later than 180 operating days after initial startup, the owner or operator shall conduct performance tests for particulates and SO_2 and furnish the Department a written report of the results of such performance tests.

2. Compliance ~~Performance~~ tests for particulate matter shall be conducted and data reduced in accordance with methods and procedures in accordance with 17-2.700, Table 700-1. ~~DER's Standard Sampling Techniques and Methods of Analysis for Determination on Air Pollutants for Point Sources, July 1975.~~

3. Compliance ~~Performance~~ tests shall be conducted under such conditions as the Department shall specify based on representative compliance of the facility. The owner or operator shall make available to the Department such records as may be necessary to determine the conditions of the


West Tocoi
CLAY COUNTY
PUTNAM COUNTY
Tocoi
214
Riverdale
Cedar Creek
209
Simms Creek
Bostwick
ST. JOHNS RIVER
PUTNAM SITE
Bridgeport
Federal Point
Hastin
13
Plant
216
17
KAY LARKIN AIRPORT
Larkin
100
Palatka
FPBL CRACKER SWAMP ROAD
Gils
Orange Mills
207
East Palatka
FPBL YELVINGTON ROAD
20
Francis
Power Plant
Yelvin
ST. JOHNS COUNTY
Lundy
2 1 0 2
MILES

compliance ~~performance~~ tests.

4. The owner or operator shall provide 15 ~~30~~days prior notice of the compliance ~~performance~~ tests to afford the Department the opportunity to have an observer present.

5. Compliance ~~Stack~~ tests for particulates ~~and~~ $~~SO_2~~$ shall be performed annually not earlier than 60 days before and not later than 60 days after the anniversary date of the previous year's annual compliance test in accordance with Conditions C.2, 3, and 4 above, provided that the requirements of Rule 17-2.700(2)(a)4., for testing each Federal fiscal year (October-September 30) are met.

6. SO_2 and NO_x Continuous Emission Monitor required by Chapter 17-2, F.A.C., and 40 C.F.R. 60 subpart Da shall comply with the quality assurance requirements for gaseous continuous emission monitoring systems described in 40 C.F.R. 60, Appendix F.

D. Reporting

1. For each Unit, stack monitoring, fuel usage and fuel analysis data shall be reported to the Department on a quarterly basis ~~commencing with the start of commercial operation in accordance with 40 C.F.R. Part 60, Section 60.7, and~~ in accordance with Section 17-2.660, ~~17-2.08~~, F.A.C.

2. Ambient air monitoring data shall be reported to the Department quaterly commencing on the date of certification by the last day of the month following the quarterly reporting period utilizing the SAROAD or other format approved by the Department in writing.

3. Beginning one month after certification the applicant shall submit to the Department a quarterly status report briefly outlining progress made on engineering design and purchase of major pieces of equipment (including control equipment). All reports and information required to be submitted under this condition shall be submitted to the Administrator of Power Plant Siting,

Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

II. Water Discharges

Any discharges into any waters of the State during construction and operation of Units No. 1 & 2 shall be in accordance with all applicable provisions of Chapter 17-3, Florida Administrative Code and 40 C.F.R., 423, Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category except as provided herein. Also the permittee shall comply with the following conditions of certification.

A. Plant Effluents and Receiving Body of Water

For discharges made from the power plant the following conditions shall apply.

1. Receiving Body of Water (RBW)

The receiving body of water has been determined by the Department to be those waters of the St. Johns River and any other water affected which are considered to be waters of the State within the definition of Chapter 403, Florida Statutes.

2. Point of Discharge (POD)

The point of discharge will be determined by the Department to be where the effluent physically enters the waters of the State.

3. Thermal Mixing Zone

The instantaneous zone of thermal mixing for cooling tower blowdown shall not exceed an area of 1,235 ~~155~~ square feet. During discharge, the blowdown from the cooling tower for Units No. 1 & 2 shall be withdrawn at the point of lowest temperature of the recirculating cooling water prior to the addition of makeup water. The temperature at the point of discharge into the St. Johns River shall not be greater than 98 ~~93~~ degrees F. The temperature of the water at the edge of the mixing zone shall not exceed the limitations of Paragraph 17-3.05(1)(d) ,except on occasions in which the temperature of the unaffected receiving waters exceeds 92 degrees F.

4. Chemical Wastes and Boiler Blowdown

All discharges of low volume wastes (demineralizer regeneration, floor drainage, lab drains and similar wastes), shall comply with Chapter 17-3. If violations of Chapter 17-3 occur, corrective action shall be taken. These wastewaters shall be discharged to an adequately sized and constructed treatment facility. Operational cleaning wastes shall be treated to comply with 40 CFT Part 423 and Chapter 17-3, F.A.C., prior to discharge. Boiler blowdown, boiler fireside wash, air preheater wash, shall be disposed of in an adequately sized percolation pond; provided, however, that boiler blowdown from either unit may also be recycled to the Unit 1 and/or 2 cooling towers.

5. Coal Pile and Limestone Pile

Coal pile runoff and Limestone Pile runoff from less than 10-year 24-hour rainfall shall be treated as required to limit the suspended solids to 50 mg/l and to prevent increases in turbidity to less than 50 JTU in waters of the state beyond a distance of 150 meters from the POD.

6. Cooling Tower Blowdown

The cooling tower blowdown shall contain no detectable amounts of material added for corrosion inhibition, including but not limited to zinc and chromium.

7. Chlorine

The quantity of total residual chlorine discharged in the blowdown from the cooling tower shall not exceed 0.1 mg/l at the POD nor 0.01 mg/l beyond an instantaneous mixing zone of 750 square feet. There will be no limit on the duration of discharge of chlorine.

8. pH

The pH of all discharges shall be such that the pH be within the range of 6.0 to 8.5.

9. Polychlorinated Biphenyl Compounds

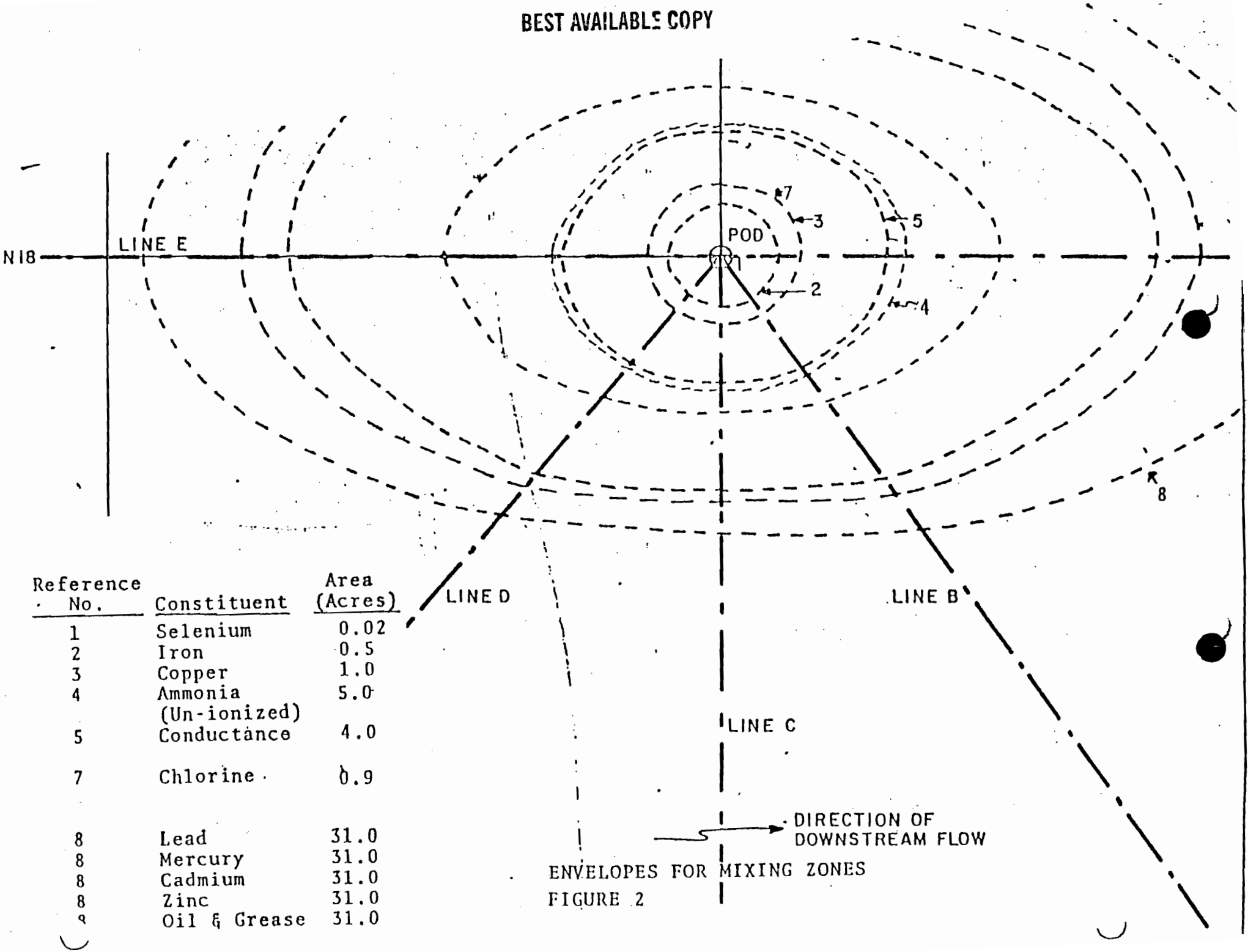
There shall be no net discharge of polychlorinated biphenyl compounds.

10. Mixing Zones

The discharge of the following pollutants shall not violate the Water Quality Standards of Chapter 17-3, F.A.C. beyond the edge of the designated instantaneous mixing zone as described herein and lcoated within the envelopes as shown on Figure 2.

Pollutants	Instantaneous Mixing Zone	Envelope of Mixing Zones	
Ammonia	10,000 ft^2	20.235 m^2	5.0 Acres
Arsenic	8 ft^2	65 m^2	0.2 Acres
Chlorine	750 ft^2	3,645 m^2	0.9 Acres
Copper	1,000 ft^2	4,047 m^2	1.0 Acres
Iron	400 ft^2	2,024 m^2	0.5 Acres
Selenium	10 ft^2	84 m^2	0.02 Acres
Specific Conductance	8,015 ft^2	16,188 m^2	4.0 Acres
Lead		125,600 m^2	31 Acres
Mercury		125,600 m^2	31 Acres
Cadmium		125,600 m^2	31 Acres
Zinc		125,600 m^2	31 Acres
Oil and Grease		125,600 m^2	31 Acres
Chromium	25 ft^2	195 m^2	0.05 Acres

BEST AVAILABLE COPY



Reference No.	Constituent	Area (Acres)
1	Selenium	0.02
2	Iron	0.5
3	Copper	1.0
4	Ammonia (Un-ionized)	5.0
5	Conductance	4.0
7	Chlorine	0.9
8	Lead	31.0
8	Mercury	31.0
8	Cadmium	31.0
8	Zinc	31.0
8	Oil & Grease	31.0

ENVELOPES FOR MIXING ZONES
FIGURE 2

11. Variances to Water Quality Standards

In accordance with the provisions of Sections 403.201 and 403.511(2), F.S., Seminole Electric Cooperative, Inc., is hereby granted variances to the Water Quality Standards of Chapter 17-3, F.A.C., for cadmium, lead, mercury, and zinc, but only at such times as the natural background levels of the St. Johns River approach or exceed those standards; in any event, the discharge shall comply with the effluent limitations set forth in paragraph II.A.12.a.

12. Effluent Limitations

a. The following instantaneous maximum effluent limitations shall apply for cadmium, mercury, lead and zinc at the locations specified:

(i) Cooling blowdown - concentrations shall not exceed four times the concentrations present in the river at Applicant's intake structure, or not exceed Class III surface water quality standards, whichever is higher.

(ii) Coal/limestone storage runoff - concentrations shall not exceed:

cadmium.....0.11 mg/l
mercury.....0.0022 mg/l
lead.....0.11 mg/l
zinc.....1.76 mg/l

(iii)bottom ash sluice blowdown - concentrations shall not exceed the unweighted sum of the amount per liter described in (i) above plus the following amounts per liter:

cadmium.....0.11 mg/l
mercury.....0.0055 mg/l
lead.....0.11 mg/l
zinc.....1.1 mg/l

b. The following instantaneous maximum effluent limitations shall apply to the discharge from the chemical wastewater treatment facility:

Pollutant	Effluent Limit (mg/l)
Ammonia	28.5
Aluminum	174
Arsenic	0.073
Copper	0.66
Cyanide	0.004
Chromium	0.14
Nickel	0.09
Selenium	0.04
Oil and grease	15

B. Water Monitoring Programs

The permittee shall monitor and report to the Department the listed parameters on the basis specified herein. The methods and procedures utilized shall receive written approval by the Department. The monitoring program may be reviewed annually by the Department, and a determination may be made as to the necessity and extent of continuation, and may be modified in accordance with Condition No. XXV.

1. Chemical Monitoring

The following parameters shall be monitored as shown during discharge and reported monthly to the Department ~~commencing with the start of commercial operation of the first unit and reported quarterly to the Department:~~

Parameter	Location	Sample Type	Frequency
Flow Intake	Intake	Recorder	Totalizer
Flow Groundwater	Wellfield pipeline	Recorder	Totalizer
Flow, Discharge	C.T. Outfall	Recorder	Totalizer
Conductivity	C.T. Outfall	Recorder	Continuous
pH	C.T. Outfall	Multiple Grab	Weekly
Temperature	C.T. Outfall	Recorder	Continuous

Parameter	Location	Sample Type	Frequency
TSS	C.T. Outfall	Grab	Weekly
Chlorine Total Residual	C.T. Outfall	Multiple Grab	Weekly
Oil and Grease	C.T. Outfall & Intake	Grab	Weekly
Metals	C.T. Outfall, Intake & Waste Treatment Facility	Multiple Grab	~~as noted below~~ quarterly
~~Arsenic~~	"	"	*
~~Copper~~	"	"	*
~~Iron~~	"	"	*
~~Aluminum~~	"	"	*
Lead	"	"	**
Mercury	"	"	**
Cadmium	"	"	**
Zinc	"	"	**

~~* Weekly for the first three months, monthly for the next nine months, then quarterly thereafter.~~

** Weekly for the first three months, biweekly for the next three months, monthly for the next three months, then quarterly thereafter.

III. Groundwater

A. General

The use of groundwater from two wells for plant service water for Units 1 and 2 shall be minimized to the greatest extent practicable, but in no case shall exceed 3.9 mgd on a maximum daily basis or 0.85 mgd on an average annual basis.

B. Well Criteria

The submission of well logs and test results and location, design and construction of wells to provide plant service water shall be in accordance with applicable rules of the Department of Environmental Regulation and the St. Johns River Water Management District (SJRWMD). Total water use per month shall be reported quarterly to SJRWMD commencing with the start of construction.

C. Water Use Restriction

Groundwater is restricted to uses other than main steam condensing. Any change in the use of said water will require a modification of this condition.

D. Emergency Shortages

In the event an emergency water shortage should be declared pursuant to Section 373.175 or 373.246, F.S., by St. Johns River Water Management District for an area including the location of these withdrawal points, the Department, pursuant to Section 403.516, F.S., may alter, modify, or declare to be inactive, all or parts of Condition III.A.-F. An authorized Water Management District Representative, at any reasonable time, may enter the property to inspect the facilities.

E. Monitoring and Reporting

Seminole shall implement the following groundwater monitoring program:

1. The static ~~groundwater~~ levels shall be monitored and the results logged in accordance with the schedule shown in Table 1 at the wells shown in Figure 3. ~~continuously at wells as approved by the DER and the St. Johns River Water Management District.~~ Chemical analyses shall be made on samples from all monitored wells identified in this Condition. The location, frequency and selected chemical analyses shall be as given in Condition III.E.4.

2. ~~The groundwater monitoring program shall be implemented at least one year prior to operation of Seminole No. 1.~~ The Chemical analyses shall be in accord with the latest edition of Standard Methods for the Analysis of Water and Wastewater. ~~The data shall be submitted within 30 days of collection/analysis to the St. Johns River Waste Management District and to the DER Power Plant Siting Section.~~

3. Seminole shall operate ~~install~~ flow meters in compliance with SJRWMD specifications on all production wells.

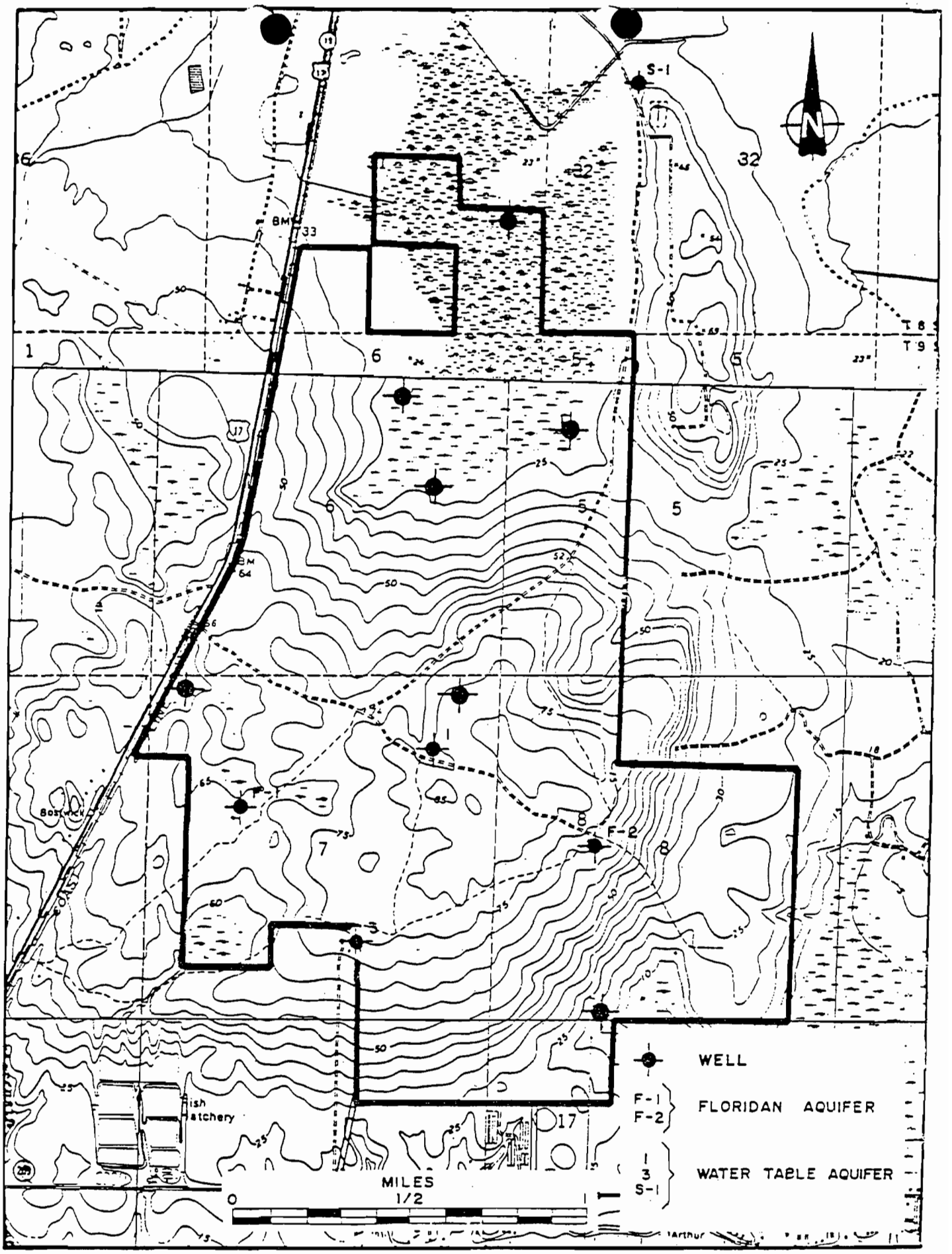


Figure 3. Monitor Well Location Map.

4. After consultation with the DER and SJRWMD, Seminole shall operate ~~install~~ a monitoring well system as generally shown in Figure 3 to monitor groundwater quality in the top 40 feet of surficial aquifer. One well shall be installed to a depth greater than 40 feet but less than 100 to monitor vertical dispersion or groundwater contaminants. Monitoring well location and designs shall be submitted to the Department and SJRWMD for review. Approval or disapproval of the locations and design shall be granted within 60 days. The water samples collected from each of the monitor wells shall be collected immediately after removal by pumping of a quantity of water equal to two casing volumes. The water quality analyses shall be performed monthly during the year prior to commercial operation and two years after operation and quarterly thereafter in accordance with the schedule shown in Table 1. Results shall be submitted to the Department and the SJRWMD by the 30th ~~15th~~ day of the month following the month during which such analyses were performed. Testing for the following constituents is required.

Conductance	Nickel
pH	Selenium
Chloride	Chromium
Iron	Arsenic
Cadmium	Beryllium
Zinc	Mercury
Copper	Lead
Sulfate	Gross Alpha
Silver	Barium

5. After the second year of monitoring and periodically thereafter, the Department and the applicant shall review the results of the monitoring program and determine the necessity for modifying or continuing the program.

F. Leachate

1. Zone of Discharge

Leachate from the FGD/sludge landfill, coal storage pile, bottom ash sump, percolation and FGD emergency pond shall not contaminate waters of the State (including both surface and groundwaters) in excess of

the limitations of Chapter 17.3, F.A.C., beyond the boundary of the site.

2. Corrective Action

When the groundwater monitoring system shows a violation of the groundwater water quality standards of Chapter 17-3, F.A.C., the appropriate ponds, FGD landfill, or coal pile shall be sealed, relocated or closed, or the operation of the affected facility shall be altered in such a manner as to assure the Department that no violation of the groundwater standards will occur beyond the boundary of the site.

IV. Control Measures During Construction

A. Stormwater Runoff

During construction and plant operation, necessary measures shall be used to settle, filter, treat or absorb silt containing or pollutant laden stormwater runoff to limit the suspended solids to 50 mg/l or less at the POD during rainfall periods less than the 10-year, 24-hour rainfall, and to prevent an increase in turbidity of more than 50 Jackson Turbidity Units above background in waters of the state beyond 150 meters from the POD.

Control measures shall consist at the minimum, of filters, sediment traps, barriers, berms or vegetative planting. Exposed or disturbed soil shall be protected as soon as possible to minimize silt and sediment laden runoff. The pH shall be kept within the range of 6.0 to 8.5 at the POD.

B. Sanitary Wastes

Disposal of sanitary wastes from construction toilet facilities shall be in accordance with applicable regulations of the Department and appropriate local health agency. The sewage treatment plant shall be operated in accordance with Chapters 17-3, 17-16, and 17-19, F.A.C. ~~Plans and specifications for the sewage treatment plant shall be submitted to the Departments St. Johns River Subdistrict Manager for review and approval prior to installation.~~

C. Environmental Control Program

An environmental control program shall be established under the supervision of a qualified person to assure that all construction activities conform to good environmental practices and the applicable conditions of certification.

The permittee shall notify the Department if unexpected harmfull effects or evidence of irreversible environmental damage are detected during construction, shall immediately report to the Department and shall within two weeks provide an analyses of the problem and a plan to eliminate or significantly reduce the harmful effects or damage, and to prevent reoccurrence.

V. Solid Wastes

Solid wastes resulting from construction or operation shall be disposed of in accordance with the applicable regulations of Chapter 17-7, F.A.C. ~~The permittee shall submit a program for approval but outlining the methods to be used in handling and disposal of solid wastes indicating at least methods for erosion control, covering, vegetation and quality control.~~

Open burning in connection with land clearing shall be in accordance with Chapter 17-5, F.A.C. No additional permits shall be required, but the Division of Forestry shall be notified prior to burning. Open burning shall not occur if the Division of Forestry has issued a ban on burning due to fire hazard conditions.

VI. Operation Safeguards

The overall design, layout, and operation of the facilities shall be such as to minimize hazards to humans and the environment. Security control measures shall be utilized to prevent exposure of the public to hazardous conditions. The Federal Occupational Safety and Health Standards will be complied with during construction and operation. The Safety Standards specified under Section 440.56, F.S., by the Industrial Safety Section of the Florida Department of Commerce will also be complied with.

VII. Screening

The permittee shall provide screening of the site through the use of aesthetically acceptable structures, vegetated earthen walls and/or existing or planted vegetation.

VIII. Potable Water Supply System

The potable water supply system shall be designed and operated in conformance with Chapter 17-22, F.A.C. Information as required in 17-22.108 shall be submitted to the Department prior to construction and operation. The operator of the potable water supply system shall be certified in accordance with Chapter 17-16, F.A.C.

IX. Transformer and Electric Switching Gear

The foundations for transformers, capacitors, and switching gear necessary for Seminole Units 1 and 2 to the existing distribution system shall be constructed of an impervious material and shall be constructed in such a manner to allow complete collection and recovery of any spills or leakage of oily, toxic, or hazardous substances.

X. Toxic, Deleterious, or Hazardous Materials

The spill of any toxic, deleterious, or hazardous materials shall be reported in the manner specified by Condition XV.

XI. Construction and Emergency Maintenance Activities in Waters of the State.

1. No construction on sovereignty submerged lands shall commence without obtaining lease or title from the Department of Natural Resources.

2. Construction of intake and discharge structures should be done in a manner to minimize turbidity. Turbidity screens should be used to prevent turbidity in excess of 50 JTU above background beyond 150 meters from the dredging, pile driving or construction site.

3. Dredging of the intake channel and discharge pipe trench should be performed by hydraulic dredge (small "mudcat" type is suitable): clamshell or

other excavating equipment is satisfactory behind cofferdams or other turbidity control devices.

4. All spoil shall be piped hydraulically or trucked to an upland disposal site of sufficient capacity to retain all material. The discharge pipe trench should be refilled with clean sand sized material.

5. Effective stabilization of submerged bottom sediments at the discharge pipe exist should be achieved and maintained during the period of operation by the placement of riprap or other suitable material.

XII. FGD/Sludge Landfill and Coal Pile

Adequate geophysical testing shall be conducted to determine if solution cavities are present under the landfill area. If such cavities are located, such cavities shall be sealed off and stabilized.

The proposed FGD sludge landfill area shall be monitored and studied pursuant to a detailed groundwater testing and monitoring program as defined in Condition III E.

The results of the program will be used by the Department in determining whether Seminole has affirmatively demonstrated that Florida Water Quality Standards (17-3 F.A.C.) will not be violated beyond the site boundary.

If the Department determines that Seminole has failed to affirmatively demonstrate that Florida Water Quality Standards (17-3 F.A.C.) will not be violated, Seminole shall present to the Department, within 90 days of such determination, a plan of correction, (which may include, if appropriate, an impermeable liner) for review and approval by the Department, and for timely implementation by Seminole.

During the initial years of operation of Unit 1, but not to exceed five years from start up of Unit 1, a FGD sludge disposal test and evaluation program shall be implemented in accordance with the program outline submitted to the Department on April 27, 1979 as attached and incorporated herein as Attachment 1. During the test program, any FGD sludge not utilized in the program shall be fixed so as to achieve an ultimate

permeability not greater than 7x10-7 cm/sec and shall be disposed of in a manner and located so as to not interfere with the sludge testing program.

Upon completion of the test and evaluation program Seminole shall submit a proposed method of FGD sludge disposal to the Department for Review. The Department shall indicate its approval or disapproval of the program within 60 days of receipt. Seminole shall implement the approved program as soon as practical upon receipt of approval from the Department. Should the program be disapproved by the Department Seminole shall fix the FGD sludge so as to achieve a permeability not greater than 1x10-7 cm/sec and place it with the bottom layer at least eight feet thick or line it with an impermeable liner.

Upon initiation of FGD sludge disposal, a quality control program shall be implemented to insure that the permeability of the FGD sludge does not exceed prescribed levels. Construction of perimeter berms of "Fixed" FGD sludge, if any, shall be in conformance with the provisions of Chapter 17-9, F.A.C., regarding earthen dams.

XIII. Transmission Lines

Directly associated transmission lines shall be ~~constructed and~~ maintained in a manner to minimize environmental impacts in accordance with Chapter 403, F.S.

~~A. Construction~~

~~1. Filling and construction in waters of the State shall be minimized to the extent practicable. No such activities shall take place without obtaining lease or title from the Department of Natural Resources.~~

~~2. Placement of fill in wetland areas shall be minimized by spanning such areas with the maximum transmission lines span practicable.~~

~~3. Construction and access roads should avoid wetlands and be located in surrounding uplands. Any fill required in wetlands for construction but not required for maintenance purposes shall be removed and the ground restored to its original contours~~

after transmission line placement.

4. Keyhold fills from upland areas are preferable to a single road and should be oriented as nearly parallel to surface water flow lines as possible.

5. Sufficient culverts shall be placed through fill causeways to maintain sheet flow. The number and locations of such culverts will be determined in the field by consultation with DER field inspectors.

6. Maintenance roads shall be planted with native species to prevent erosion and subsequent water quality degradation.

7. Construction activities should proceed as much as possible during the dry season.

8. Turbidity control measures, where needed, shall be employed to prevent violation of water quality standards.

9. Good environmental practices as described in Environmental Criteria for Electric Transmission Systems as published by the U.S. Department of Interior and the U.S. Department of Agriculture should be followed.

10. Any archaeological sites discovered during construction of the transmission lines shall be disturbed as little as possible and such discovery shall be communicated to the Department of State, Division of Archives, History and Records Management.

B. Maintenance

1. Vegetative removal for maintenance should be carried out in the following manner:

Vegetative clearing operations to be carried out within the corridor should follow the general standards for clearing rights-of-way for overhead transmission lines and follow good environmental practices as described in environmental criteria for Electric Transmission Systems, as published by The U.S. Department of The Interior and The U.S. Department of Agriculture, thus preserving immature tree species along the peripheries of the right-of-

way. These standards define the zone that shall be cleared of all tree growth as the area between structures 10 ft. to either side of the outside conductor. The remainder of the right-of-way from the cleared area to the right-of-way limit shall be screened. This translates to mean that only trees in excess of 10 ft. in height would be removed from the outer zone except where location of the access roads necessitates complete clearing.

~~2.~~ B. Approved Chemicals or herbicides may be used for vegetation control along the transmission line without prior approval of the Department.

XIV. Change in Discharge

All discharges or emission authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any pollutant not identified in the application, or any discharge more frequent than, or at a level in excess of that authorized herein, shall constitute a violation of the certification. Any anticipated facility expansions, production increases, or process modification which will result in new, different or increased discharges or expansion in steam generating capacity will require a submission of a new or supplemental application pursuant to Chapter 403, Florida Statutes.

XV. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any limitation specified in this certification, the permittee shall notify the St. Johns River Subdistrict Manager of the Department by telephone during the working day during which permittee becomes aware of said noncompliance and shall confirm this situation in writing within seventy-two (72) hours of first becoming aware of such conditions, supplying the following information:

a. A description and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and stops being taken to reduce, eliminate and prevent recurrence of the noncomplying event.

XVI. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification. Such systems are not to be bypassed without prior department approval, except, during periods of when light oil is used for ignition, the FGD system may be bypassed.

XVII. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact resulting from noncompliance with any limitation specified in this certification, including but not limited to such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying event.

XVIII. Right of Entry

The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which records are required to be kept under the terms and conditions of this permit; and

b. To have access to and copy all records required to be kept under the conditions of this certification; and

c. To inspect and test any monitoring equipment or monitoring method required in this certification and to sample any discharge or pollutants, and

d. To assess any damage to the environment or violation of ambient standards.

XIX. Revocation or Suspension

This certification may be suspended or revoked

pursuant to Section 403.512, Florida Statutes, or for violations of any Condition or certification.

XX. Civil and Criminal Liability

This certification does not relieve the permittee from civil or criminal responsibility or liability for noncompliance with any conditions of this certification, applicable rules or regulations of the Department, or Chapter 403, Florida Statutes, or regulations thereunder.

Subject to Section 403.511, Florida Statutes, this certification shall not preclude the institution of any legal action or relieve the permittee from any responsibilities or penalties established pursuant to any other applicable State Statutes or regulations.

XXI. Property Rights

The issuance of this certification does not convey any property rights in either real or personal property tangible or intangible, nor any exclusive priviledges, nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations. The applicant will obtain title, lease or right of use from the State of Florida, to any sovereign submerged lands occupied by the plant, transmission line structures, or appurtenant facilities.

XXII. Severability

The provisions of this certification are severable, and if any provision of this certification, or the application of any provision of this certification to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of the certification shall not be affected thereby.

XXIII. Definitions

The meaning of terms used herein shall be governed by the definitions contained in Chapter 403, Florida Statutes, and any regulation adopted pursuant thereto. In the event of any dispute over the meaning of a term

used in these general or special conditions which is not defined in such statutes or regulations, such dispute shall be resolved by reference to the most relevant definitions contained in any other state or federal statute or regulation or, in the alternative by the use of the commonly accepted meaning as determined by the Department.

XXIV. Review of Site Certification

The certification shall be final unless revised, revoked or suspended pursuant to law. At least every five years from the date of issuance of this certification or any National Pollutant Discharge Elimination System Permit issued pursuant to the Federal Water Pollution Control Act Amendments of 1972, for the plant units, the Department shall review all monitoring data that has been submitted to it during the proceeding five-year period, for the purposes of determining the extent of the permittee's compliance with the conditions of this certification of the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the permittee. Such results will be repeated at least every five years thereafter.

XXV. Modification of Conditions

The conditions of this certification may be modified in the following manner:

a. The Board hereby delegates to the Secretary the authority to modify, after notice and opportunity for hearing, any conditions pertaining to monitoring, testing and evaluation programs, sampling, groundwater, mixing zones, zones of discharge or variances to water quality standards, or location of transmission line corridors within areas already approved at the land use hearing.

b. All other modifications shall be made in accordance with Section 403.516, Florida Statutes.

Best Available Copy

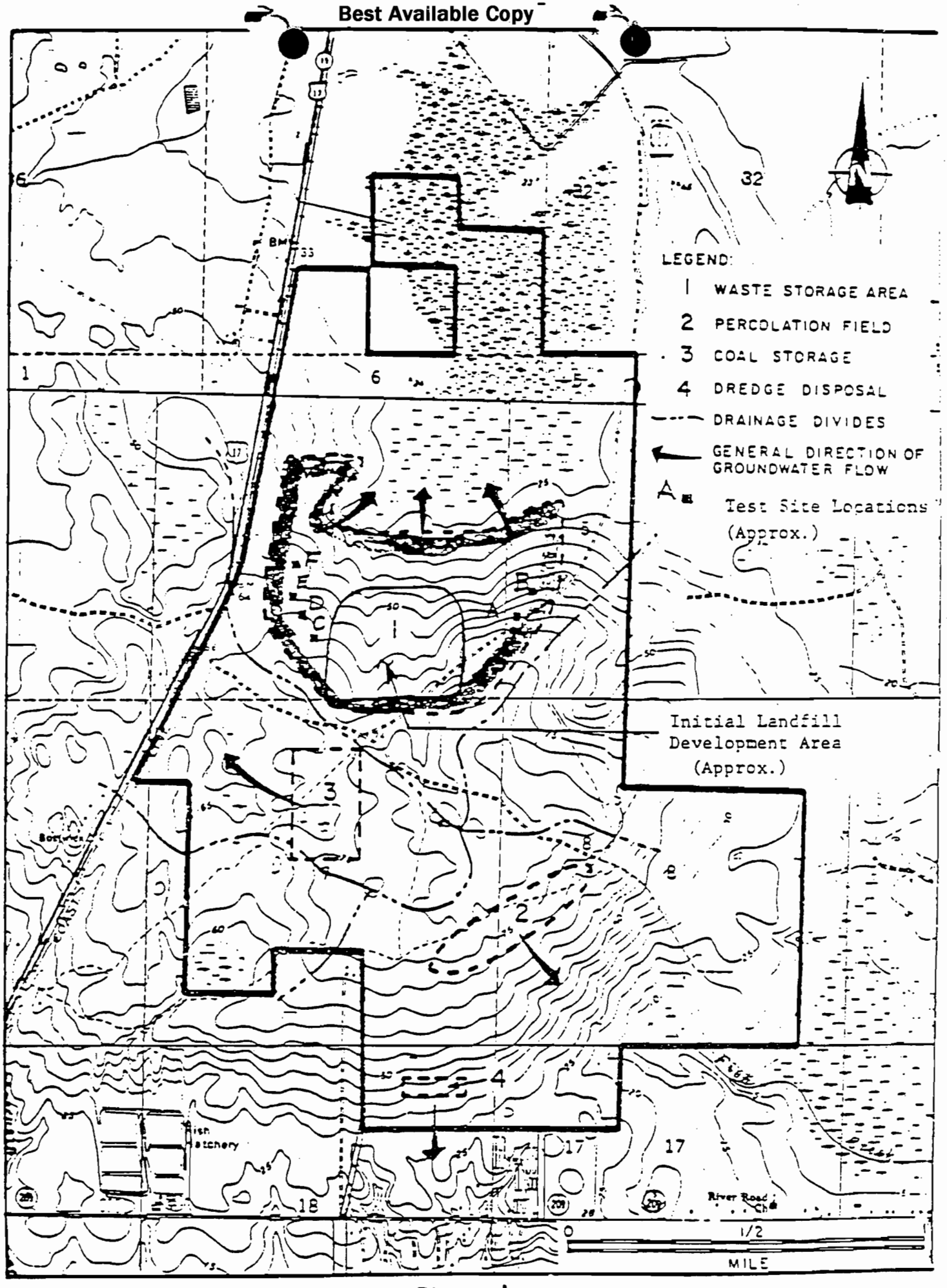
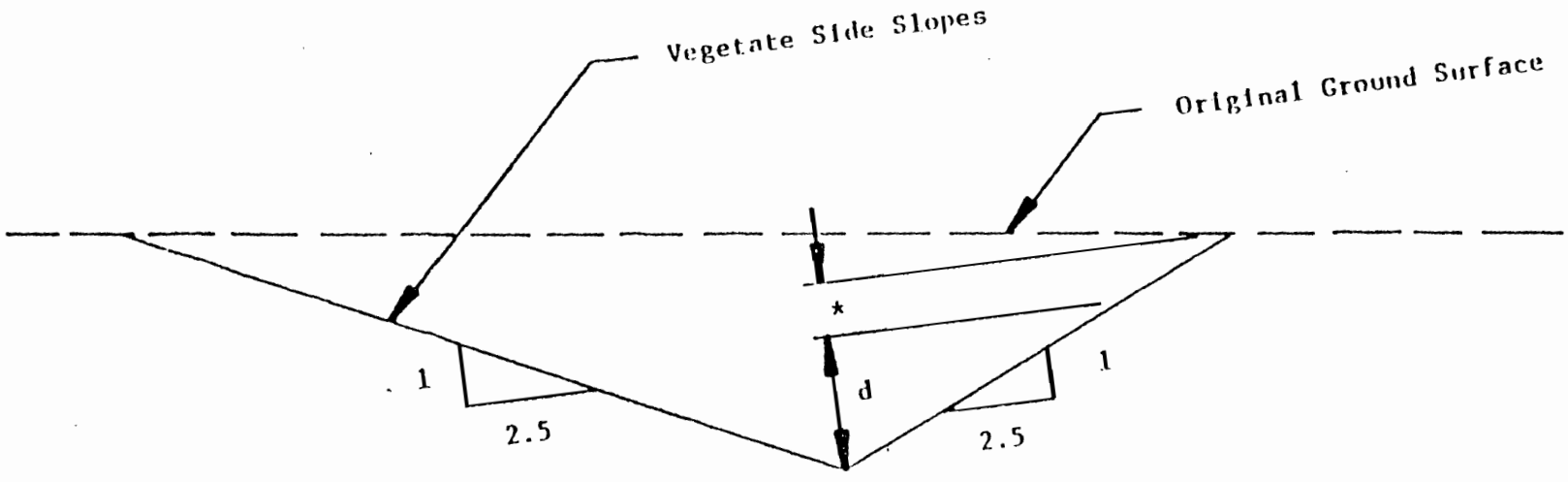


Figure A



d = Flow Depth

* = Freeboard, 1'-0 min.

Figure B

TYPICAL CROSS SECTION

DIVERSION CHANNEL

NO SCALE

PROPOSED PROGRAM FOR MONITORING AND EVALUATING THE GEOTECHNICAL AND ENVIRONMENTAL CHARACTERISTICS OF FGD SLUDGE AND ASH DISPOSAL

Seminole Electric Cooperative, Inc. (SECI) wishes to demonstrate to the Florida Department of Environmental Regulation (DER) and the Environmental Protection Agency (EPA) that it has the capability to dispose of the various power plant waste materials which will be produced at Seminole Units 1 and 2 in an environmentally acceptable manner. To ensure this environmentally acceptable disposal, SECI intends to include in its power plant sub-systems, a waste treatment system capable of processing all of the FGD sludge, fly ash and bottom ash produced by both Seminole Units 1 and 2. This waste treatment system will utilize accepted pozzolanic technology to chemically fix the power plant waste products.

Sludge and fly ash processed through the plant using the fixation process shall be defined herein as "stabilized" material. Sludge and fly ash blended within the plant without fixation additives shall be defined herein as "unstabilized" material.

The primary emphasis of the program is to evaluate the handleability, economics, structural stability and environmental acceptability of unstabilized fly ash and sludge (either unoxidized or oxidized) mixtures, and to develop a long term disposal plan in line with sound engineering principles acceptable to the DER and the EPA.

Attached please find our outline for the proposed program, Exhibit II, and Figures A through E.

ATTACHMENT 1

OUTLINE

PHASE I - DESIGN AND DEVELOPMENT OF MONITORING PROGRAM

A. Develop Disposal Concepts

- Unstabilized disposal
- Encapsulation
- Selected stabilization
- Total stabilization

B. Select Disposal Concepts for Test Cell Development and Monitoring

- Unstabilized disposal
- Selected stabilization and encapsulation of oxidized sludge and ash.
- Selected stabilization and encapsulation of unoxidized sludge and ash
- Total stabilization of oxidized or unoxidized sludge and ash

C. Design Test Cells and Monitoring Program for Concept Evaluation - See Figures A thru E

- Establish monitoring point locations
- Design test cells
- Develop field and laboratory test program

PHASE II - IMPLEMENTATION AND EVALUATION OF MONITORING PROGRAM

A. Monitoring, Quality Control and Testing Program

- Establish physical and chemical characteristics of disposal materials
- Monitor runoff and leachate
- Determine in situ material characteristics with regard to density, strength, permeability, stability, etc.

B. Establish Effect of Various Disposal Concepts on Operations

- Equipment and manpower requirements
- Operating efficiency
- Seasonal variations
- Operational difficulties

PHASE III - EVALUATION OF SHORT AND LONG TERM EFFECTS OF VARIOUS CONCEPTS

A. Environmental Acceptability

- Meets or exceeds Florida water quality standards

B. Structural Integrity

- Immediate and long term stability

C. Operational Feasibility

- Potential for reclaimation and future land use

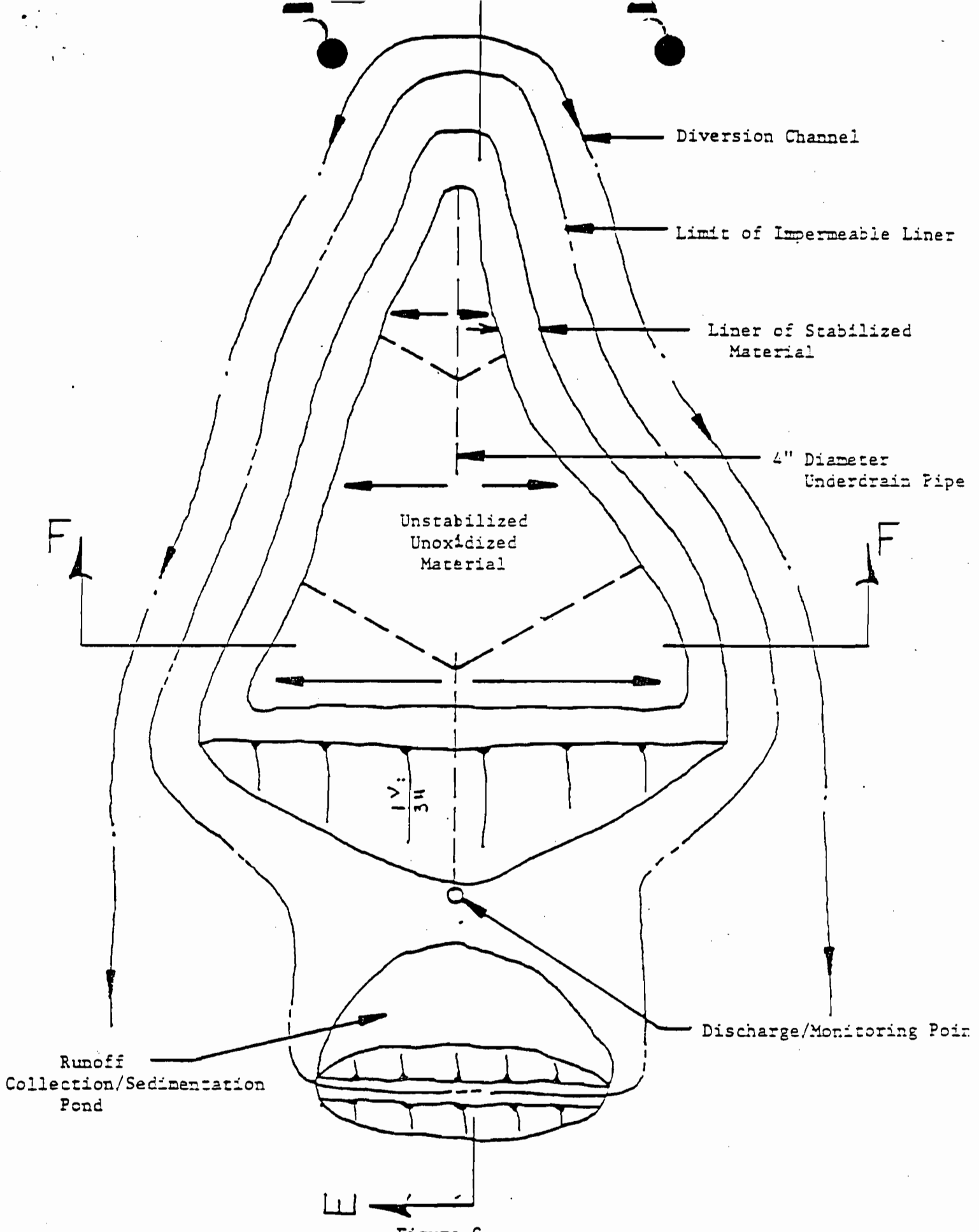


Figure C
TEST SITE C
SITE PLAN
NO SCALE

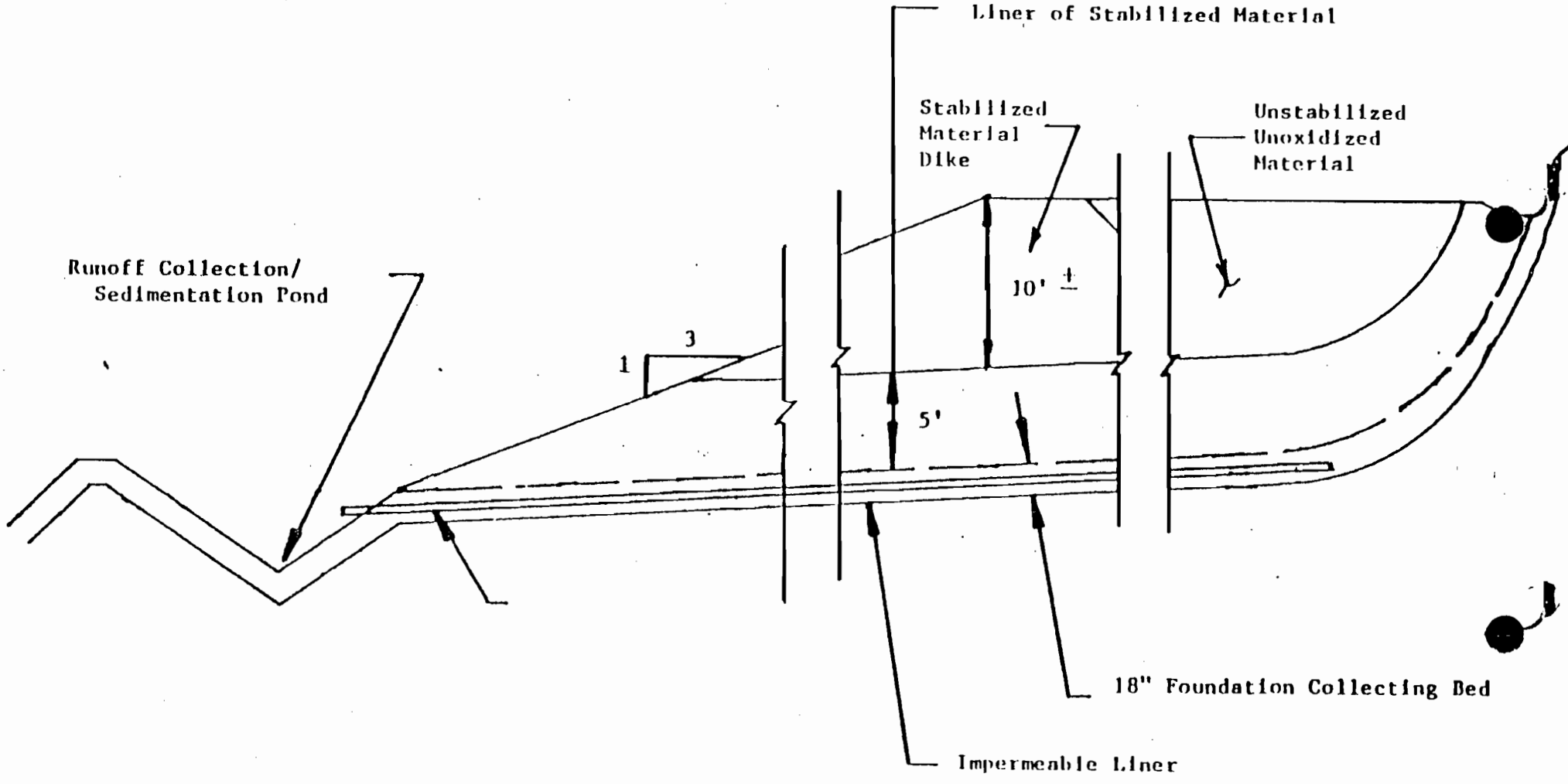


Figure D

SECTION EE

TYPICAL CROSS SECTION

NO SCALE

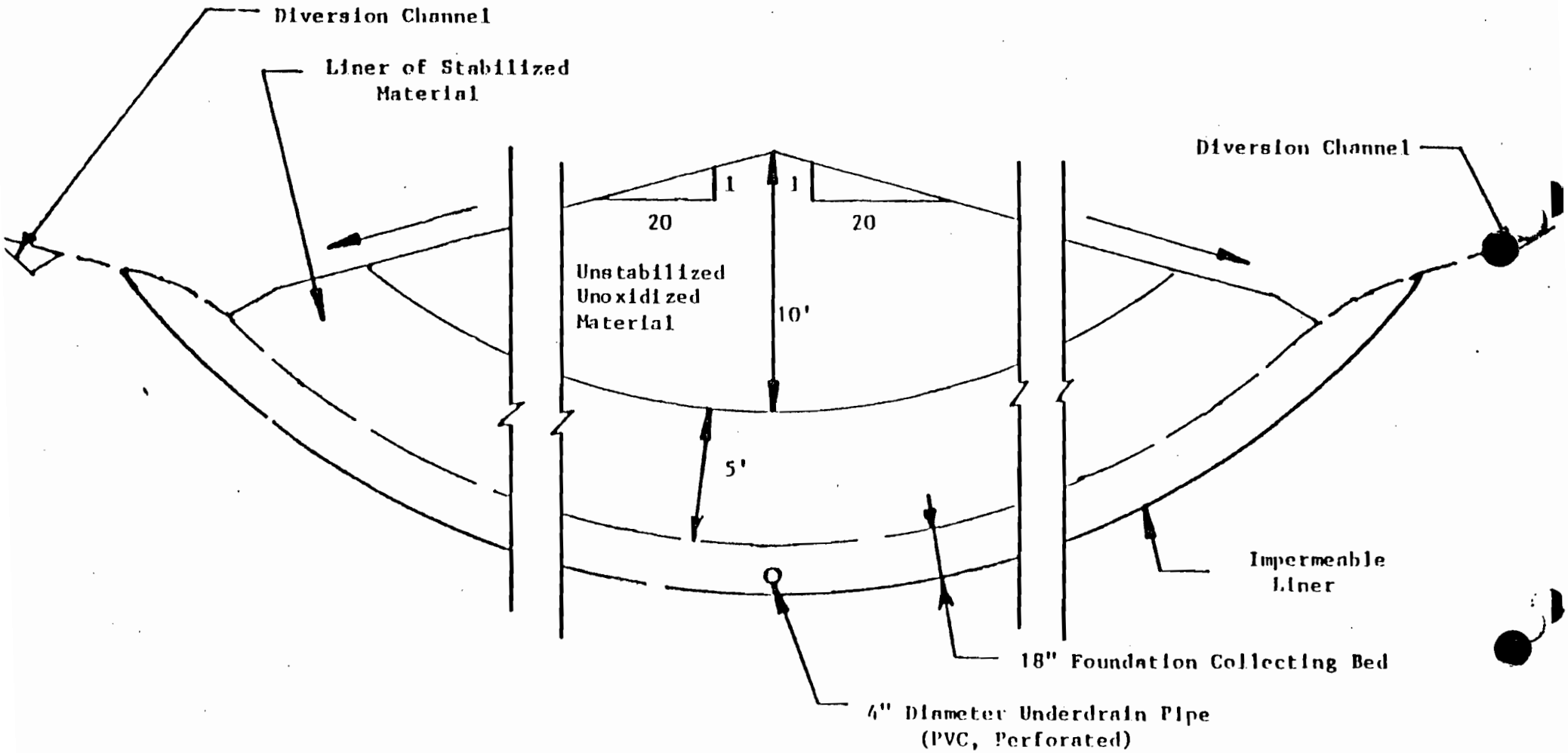


Figure E

SECTION FF

TYPICAL CROSS SECTION

NO SCALE

Conditions of Certification
as modified in 1988

State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10
CONDITIONS OF CERTIFICATION

Table of Contents

		Page
I.	Air	1
	A. Emission Limitations	1
	B. Air Monitoring Program	2
	C. Stack Testing	3
	D. Reporting	4
II.	Water Discharges	5
	A. Plant Effluents	5
	1. Receiving Body of Water	5
	2. Point of Discharge	6
	3. Thermal Mixing Zone	6
	4. Chemical Wastes/Boiler Blowdown	6
	5. Coal Pile and Limestone Pile	7
	6. Cooling Tower Blowdown	7
	7. Chlorine	7
	8. pH	7
	9. PCB Compounds	7
	10. Mixing Zones	7
	11. Variances to Water Quality Standards	8
	12. Effluent Limitations	8
	B. Water Monitoring Program	10
	1. Chemical Monitoring	10
III.	Groundwater	11
	A. General	11
	B. Well Criteria	11
	C. Water Use Restriction	11
	D. Emergency Shortages	11
	E. Monitoring and Reporting	12
	F. Leachate	13
	1. Zone of Discharge	13
	2. Corrective Action	13
IV.	Control Measures During Construction	14
	A. Stormwater Runoff	14
	B. Sanitary Wastes	14
	C. Environmental Control Program	14
V.	Solid Wastes	15
VI.	Operation Safeguards	15
VII.	Screening	15

VIII.	Potable Water Supply System	16
IX.	Transformer and Electric Switching Gear	16
X.	Toxic, Deleterious, or Hazardous Materials Activities in Waters of the State	16
XI.	Construction and Emergency Maintenance Activities in Waters of the State	16
XII.	FGD/Sludge Landfill and Coal Pile	17
XIII.	Transmission Lines	18
XIV.	Change in Discharge	20
XV.	Noncompliance Notification	21
XVI.	Facilities Operation	21
XVII.	Adverse Impact	21
XVIII.	Right of Entry	22
XIX.	Revocation or Suspension	22
XX.	Civil and Criminal Liability	22
XXI.	Property Rights	23
XXII.	Severability	23
XXIII.	Definitions	23
XXIV.	Review of Site Certification	23
XXV.	Modification of Conditions	24

Radioactive Materials : 105-91

State of Florida Department of Environmental Regulation
Seminole Electric Cooperative, Inc.
Seminole Units 1 & 2
PA 78-10

CONDITIONS OF CERTIFICATION

I. Air

The construction and operation of Units No. 1 and 2 at the Seminole steam electric power plant site shall be in accordance with all applicable provisions of Chapters 17-2, 17-5 and 17-7, Florida Administrative Code. In addition to the foregoing, the permittee shall comply with the following conditions of certification:

A. Emission Limitations

1. Stack emissions from Units 1 and 2 shall not exceed the following when burning coal:

   a. SO_2 - 1.20 lb. per million BTU heat input, maximum two hour average.

   b. NO_x - 0.70 lb per million BTU heat input, maximum two hour average, 0.60 lbs. per million Btu, 30 day rolling average.

   c. Particulates - 0.03 lb. per million BTU heat input.

2. The height of the boiler exhaust stack for Units No. 1 & 2 shall not be less than 675 ft. above grade.

3. Particulate emissions from the coal handling facilities:

   a. The applicant shall not cause to be discharged into the atmosphere from any coal processing or conveying equipment, coal storage system or coal transfer and loading system processing coal, visible emissions which exceed 20 percent opacity. Particulate emissions shall be

controlled by use of control devices having a removal efficiency of not less than 99.9%.

b. The applicant must submit to the Department within ten working days after it becomes available, copies of technical data pertaining to the selected particulate emissions control for the coal handling facility. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of such device if the Department determines the selected control device to be inadequate to meet the emission limits specified in 3. a. above. Such disapproval shall be issued within 30 days of receipt of the technical data.

4. Particulate emissions from the FGD sludge fixing facility shall be in compliance with Section 17-2.05(2).

B. Air Monitoring Program

1. The permittee shall install and operate continuous monitoring devices for the Units No. 1 & 2 boiler exhausts for sulfur dioxide, nitrogen dioxide and opacity. The monitoring devices shall meet the applicable requirements of Rules 17-2.660, F.A.C., and 40 C.F.R. 60. The opacity monitor may be placed in the duct work between the electrostatic precipitator and the FGD scrubber.

2. The permittee shall operate an ambient monitoring device for sulfur dioxide in accordance with EPA reference methods in 40 C.F.R., Part 53 and an ambient monitoring device for suspended particulates as shown on Figure 1. The monitoring device shall be specifically

located at a location approved by the Department. The frequency of operation shall be every six days commencing as specified by the Department.

3. The permittee shall maintain a daily log of the amounts and types of fuels used and copies of fuel analyses containing information on sulfur content, ash content and heating values.

4. The permittee shall provide sampling ports into the stack and shall provide access to the sampling ports in accordance with Rule 17-2.700, Table 700-1, F.A.C., and 40 C.F.R. 60.8.

5. The ambient monitoring program may be reviewed annually beginning two years after start-up of Unit No. 2 by the Department and the permittee.

6. Prior to operation of the source, the applicant shall submit to the Department a standardized plan or procedure that will allow the applicant to monitor emission control equipment efficiency and enable the applicant to return malfunctioning equipment to proper operation as expeditiously as possible.

C. Stack Testing

1. Within 60 calendar days after achieving the maximum capacity at which each unit will be operated, but no later than 180 operating days after initial startup, the owner or operator shall conduct performance tests for particulates and SO_2 and furnish the Department a written report of the results of such performance tests.

2. Compliance tests for particulate matter shall be conducted and data reduced in accordance with Rule 17-2.700, and Table 700-1, F.A.C..

3. Compliance tests shall be conducted under such conditions as the Department shall

specify based on representative compliance of the facility. The owner or operator shall make available to the Department such records as may be necessary for the Department to determine the appropriate operating conditions of the compliance tests.

4. The owner or operator shall provide 15 days prior written notice of the compliance tests to afford the Department the opportunity to have an observer present.

5. Compliance tests for particulates shall be performed annually during a testing period that commences not earlier than 60 days before and not later than 60 days after the anniversary date of the last compliance test in accordance with Conditions C.2, 3, and 4 above, provided that the requirements of Rule 17-2.700(2)(a)4., for testing each fiscal year (October-September 30) are met. If the plant is shut down for reasons beyond the control of the owner such that testing during the normal testing period cannot be accomplished, the annual compliance test shall be performed within 60 days after the unit is restarted and reaches its normal commercial production rate.

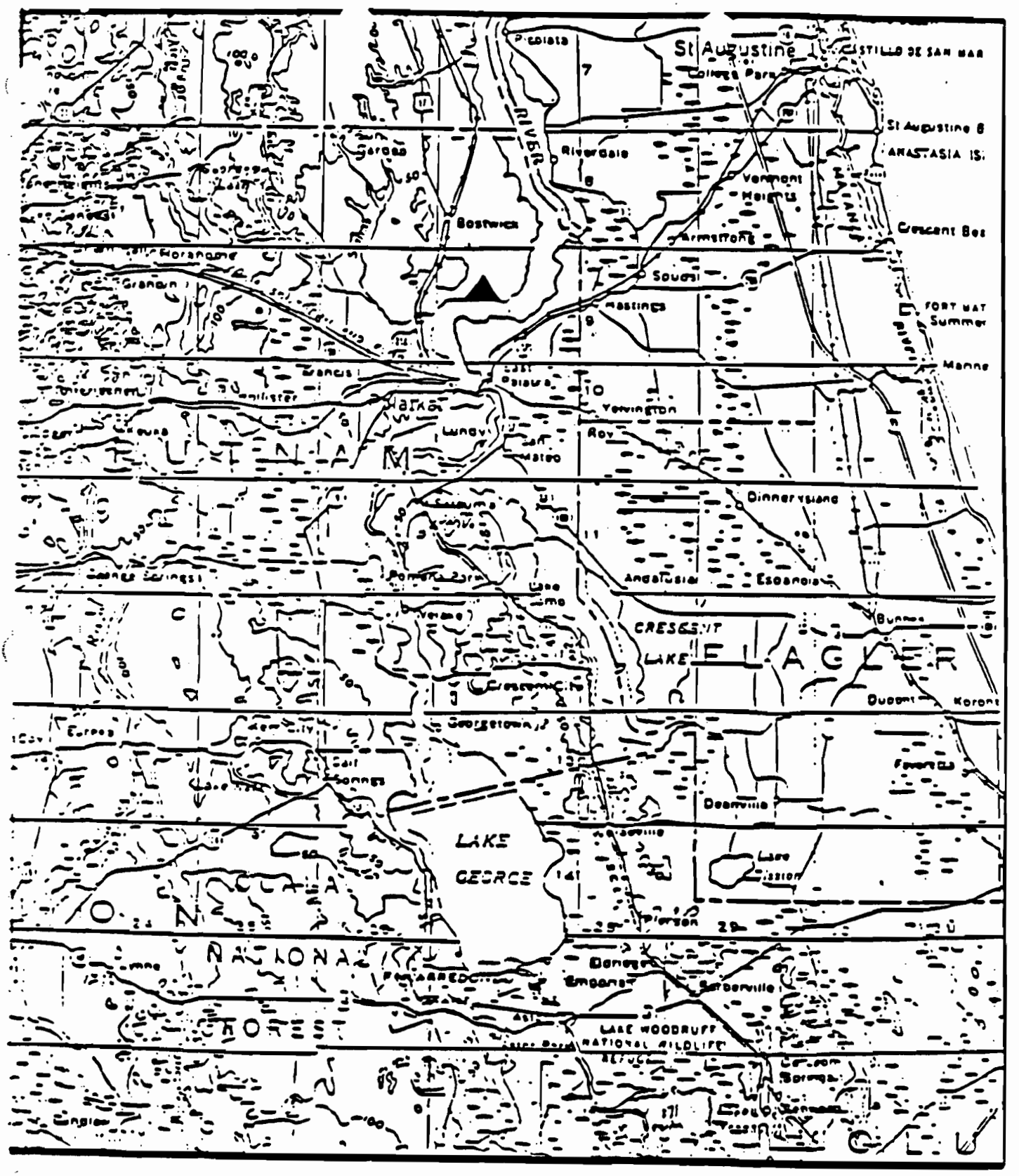
6. SO_2 and NO_x Continuous Emission Monitors required by Chapter 17-2, F.A.C., and 40 C.F.R. 60 subpart Da shall comply with the quality assurance requirements for continuous emission monitoring systems described in 40 C.F.R. 60, Appendix F.

D. Reporting

1. For each Unit, stack monitoring, fuel usage and fuel analysis data shall be reported to the Department on a quarterly basis in accordance with Rule 17-2.660, F.A.C..

2. Ambient air monitoring data shall be reported to the Department quaterly

BEST AVAILABLE COPY



▲ FIGURE 1: Location of Ambient Air Quality Monitoring Station

commencing on the date of certification by the last day of the month following the quarterly reporting period utilizing the SAROAD or other format approved by the Department in writing.

3. Beginning one month after certification the applicant shall submit to the Department a quarterly status report briefly outlining progress made on engineering design and purchase of major pieces of equipment (including control equipment). All reports and information required to be submitted under this condition shall be submitted to the Administrator of Power Plant Siting, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

II. Water Discharges

Any discharges into any waters of the State during construction and operation of Units No. 1 & 2 shall be in accordance with all applicable provisions of Chapter 17-3, Florida Administrative Code and 40 C.F.R., 423, Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category except as provided herein. Also the permittee shall comply with the following conditions of certification.

A. Plant Effluents and Receiving Body of Water

For discharges made from the power plant the following conditions shall apply.

1. Receiving Body of Water (RBW)

The receiving body of water has been determined by the Department to be those waters of the St. Johns River and any other water affected which are considered to be waters of the State within the definition of Chapter 403, Florida Statutes.

Best Available Copy

2. Point of Discharge (POD)

The point of discharge will be determined by the Department to be where the effluent physically enters the waters of the State.

3. Thermal Mixing Zone

3. Modified per 10/16/92 Final Order

The instantaneous zone of thermal mixing for cooling tower blowdown shall not exceed an area of 1,235 square feet. During discharge, the blowdown from the cooling tower for Units No. 1 & 2 shall be withdrawn at the point of lowest temperature of the recirculating cooling water prior to the addition of makeup water. The temperature at the point of discharge into the St. Johns River shall not be greater than 98 degrees F. The temperature of the water at the edge of the mixing zone shall not exceed the limitations of Paragraph 17-3.05(1)(d), F.A.C.,except on occasions in which the temperature of the unaffected receiving waters exceeds 92 degrees F.

4. Chemical Wastes and Boiler Blowdown

All discharges of low volume wastes (demineralizer regeneration, floor drainage, lab drains and similar wastes), shall comply with Chapter 17-3. If violations of Chapter 17-3 occur, corrective action shall be taken. These wastewaters shall be discharged to an adequately sized and constructed treatment facility. Operational cleaning wastes shall be treated to comply with 40 CFR Part 423 and Chapter 17-3, F.A.C., prior to discharge. Boiler blowdown, boiler fireside wash, air preheater wash, and stack wash shall be disposed of in an adequately sized percolation pond; provided, however, that boiler blowdown from either unit may also be recycled to the Unit 1 and 2 cooling towers.

5. Coal Pile and Limestone Pile

Coal pile runoff and Limestone Pile runoff from less than 10-year 24-hour rainfall shall be treated as required to limit the suspended solids to 50 mg/l and to prevent increases in turbidity to less than 50 JTU in waters of the state beyond a distance of 150 meters from the POD.

6. Cooling Tower Blowdown

The cooling tower blowdown shall contain no detectable amounts of material added for corrosion inhibition, including but not limited to zinc and chromium.

1993 NPDES is more stringent for chlorine

7. Chlorine

The quantity of total residual chlorine discharged in the blowdown from the cooling tower shall not exceed 0.1 mg/l at the POD nor 0.01 mg/l beyond an instantaneous mixing zone of 750 square feet. There will be no limit on the duration of discharge of chlorine.

8. pH

The pH of all discharges shall be such that the pH be within the range of 6.0 to 8.5.

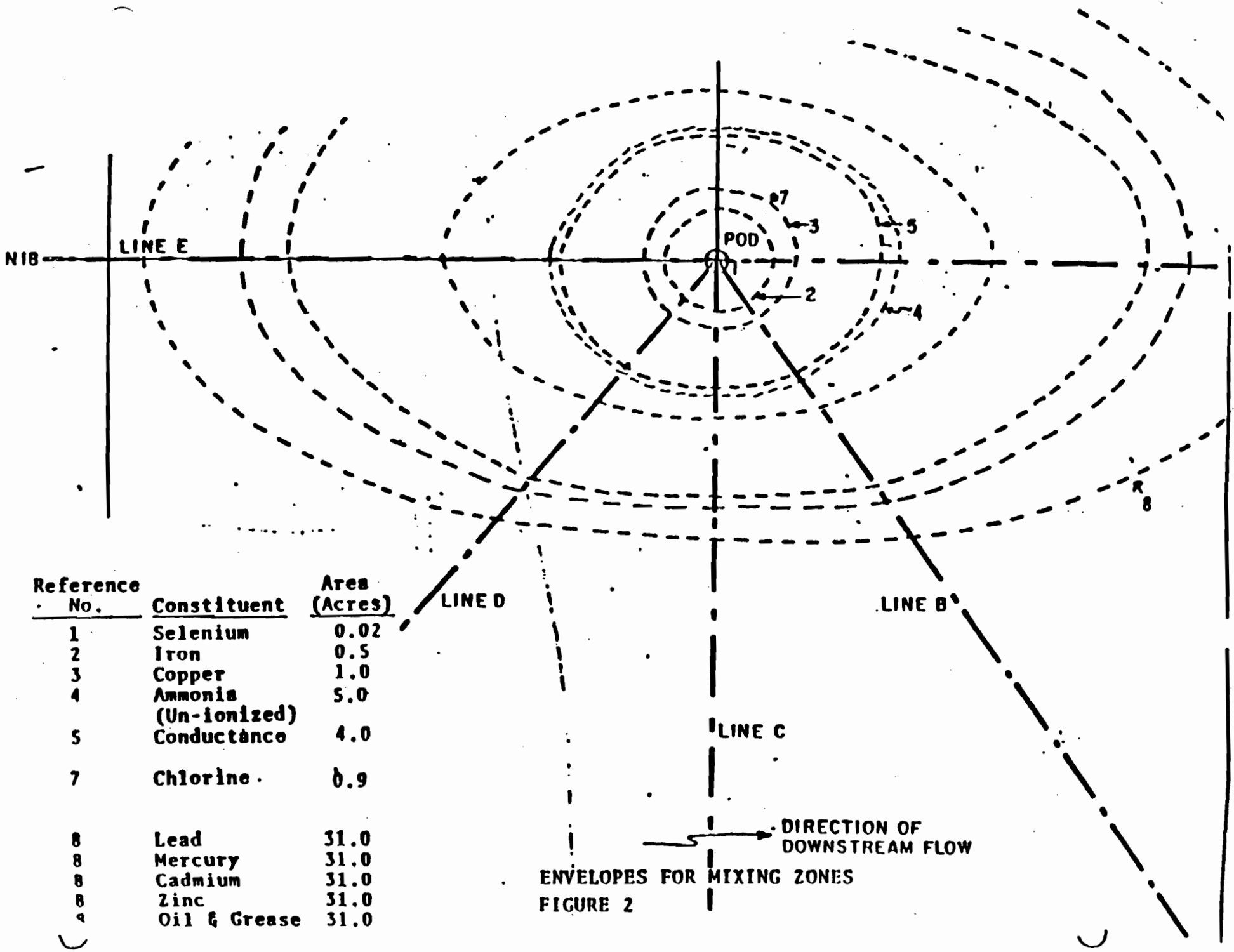
9. Polychlorinated Biphenyl Compounds

There shall be no net discharge of polychlorinated biphenyl compounds.

10. Mixing Zones

The discharge of the following pollutants shall not violate the Water Quality Standards of Chapter 17-3, F.A.C. beyond the edge of the designated instantaneous mixing zone as described herein and located within the envelopes as shown on Figure 2.

BEST AVAILABLE COPY



Reference No.	Constituent	Area (Acres)
1	Selenium	0.02
2	Iron	0.5
3	Copper	1.0
4	Ammonia (Un-ionized)	5.0
5	Conductance	4.0
7	Chlorine	0.9
8	Lead	31.0
8	Mercury	31.0
8	Cadmium	31.0
8	Zinc	31.0
8	Oil & Grease	31.0

ENVELOPES FOR MIXING ZONES
FIGURE 2

Pollutants	Instantaneous Mixing Zone	Envelope of Mixing Zones	
Ammonia	10,000 ft^2	20.235 m^2	5.0 Acres
Arsenic	8 ft^2	65 m^2	0.2 Acres
Chlorine	750 ft^2	3,645 m^2	0.9 Acres
Copper	1,000 ft^2	4,047 m^2	1.0 Acres
Iron	400 ft^2	2,024 m^2	0.5 Acres
Selenium	10 ft^2	84 m^2	0.02 Acres
Specific Conductance	8,015 ft^2	16,188 m^2	4.0 Acres
Lead		125,600 m^2	31 Acres
Mercury		125,600 m^2	31 Acres
Cadmium		125,600 m^2	31 Acres
Zinc		125,600 m^2	31 Acres
Oil and Grease		125,600 m^2	31 Acres
Chromium	25 ft^2	195 m^2	0.05 Acres

11. Variances to Water Quality Standards

In accordance with the provisions of Sections 403.201 and 403.511(2), F.S., Seminole Electric Cooperative, Inc., is hereby granted variances to the Water Quality Standards of Chapter 17-3, F.A.C., for cadmium, lead, mercury, and zinc, but only at such times as the natural background levels of the St. Johns River approach or exceed those standards; in any event, the discharge shall comply with the effluent limitations set forth in paragraph II.A.12.a.

12. Effluent Limitations

a. The following instantaneous maximum

effluent limitations shall apply for cadmium, mercury, lead and zinc at the locations specified:

(i) Cooling blowdown - concentrations shall not exceed four times the concentrations present in the river at Applicant's intake structure at the time of intake, or not exceed Class III surface water quality standards, whichever is higher.

(ii) Deleted per (date) Final Order

~~(ii) Coal/limestone storage runoff - concentrations shall not exceed:~~

~~cadmium.....0.11 mg/l~~
~~mercury.....0.0022 mg/l~~
~~lead.....0.11 mg/l~~
~~zinc.....1.76 mg/l~~

(iii)bottom ash sluice blowdown - concentrations shall not exceed the unweighted sum of the amount per liter described in (i) above plus the following amounts per liter:

cadmium.....0.11 mg/l
mercury.....0.0055 mg/l
lead.....0.11 mg/l
zinc.....1.1 mg/l

b. The following instantaneous maximum effluent limitations shall apply to the discharge from the chemical wastewater treatment facility:

Pollutant	Effluent Limit (mg/l)
Ammonia	28.5
Aluminum	174
Arsenic	0.073
Copper	0.66
Cyanide	0.004
Chromium	0.14
Nickel	0.09

Selenium	0.04
Oil and grease	15

B. Water Monitoring Programs

The permittee shall monitor and report to the Department the listed parameters on the basis specified herein. The methods and procedures utilized shall receive written approval by the Department. The monitoring program may be reviewed annually by the Department, and a determination may be made as to the necessity and extent of continuation, and may be modified in accordance with Condition No. XXV.

1. Chemical Monitoring

The following parameters shall be monitored as shown during discharge and reported monthly to the DER Northeast District Office:

Parameter	Location	Sample Type	Frequency
Flow Intake	Intake	Recorder	Totalizer
Flow Groundwater	Wellfield pipeline	Recorder	Totalizer
Flow, Discharge	C.T. Outfall	Recorder	Totalizer
Conductivity	C.T. Outfall	Recorder	Continuous
pH	C.T. Outfall	Multiple Grab	Weekly
Temperature	C.T. Outfall	Recorder	Continuous

Parameter	Location	Sample Type	Frequency
TSS	C.T. Outfall	Grab	Weekly
Chlorine Total Residual	C.T. Outfall	Multiple Grab	Weekly
Oil and Grease	C.T. Outfall & Intake	Grab	Weekly
Metals	C.T. Outfall, Intake & Waste Treatment Facility	Multiple Grab	Quarterly
Lead	"	"	*
Mercury	"	"	*
Cadmium	"	"	*
Zinc	"	"	*

*Weekly for the first three months, biweekly for the next three months, monthly for the next three months, then quarterly thereafter.

III. Groundwater

A. General

The use of groundwater from two wells for plant service water for Units 1 and 2 shall be minimized to the greatest extent practicable, but in no case shall exceed 3.9 mgd on a maximum daily basis or 0.85 mgd on an average annual basis.

B. Well Criteria

The submission of well logs and test results and location, design and construction of wells to provide plant service water shall be in accordance with applicable rules of the Department of Environmental Regulation and the St. Johns River Water Management District (SJRWMD). Total water use per month shall be reported quarterly to SJRWMD commencing with the start of construction.

C. Water Use Restriction

Groundwater is restricted to uses other than main steam condensing. Any change in the use of said water will require a modification of this condition.

D. Emergency Shortages

In the event an emergency water shortage should be declared pursuant to Section 373.175 or 373.246, F.S., by St. Johns River Water Management District for an area including the location of these withdrawal points, the Department, pursuant to Section 403.516, F.S., may alter, modify, or declare to be inactive, all or parts of Condition III.A.-F. An authorized Water Management District Representative, at any reasonable time, may enter the property to inspect the facilities.

E. Monitoring and Reporting

Seminole shall implement the following groundwater monitoring program:

Modified per 12/27/91 letter from MPO to FDER

1. Static groundwater levels shall be monitored and the results logged at wells as approved by the DER and the St. Johns River Water Management District in accordance with the schedule shown in Table 1 at the wells shown in Figure 3. Chemical analyses shall be made on samples from all monitored wells identified in this Condition. The location, frequency and selected chemical analyses shall be as given in Condition III.E.4.

2. The Chemical analyses shall be in accord with the latest edition of Standard Methods for the Analysis of Water and Wastewater.

3. Seminole shall operate flow meters in compliance with SJRWMD specifications on all production wells.

4. After consultation with the DER and SJRWMD, Seminole shall install a monitoring well system as generally shown in Figure 3 to monitor groundwater quality in the top 40 feet of surficial aquifer. One well shall be installed to a depth greater than 40 feet but less than 100 to monitor vertical dispersion or groundwater contaminants. Monitoring well location and designs shall be submitted to the Department and SJRWMD for review. Approval or disapproval of the locations and design shall be granted within 60 days. The water samples collected from each of the monitor wells shall be collected immediately after removal by pumping of a quantity of water equal to two casing volumes. The water quality analyses shall be performed monthly during the year prior to commercial operation and two years after operation and quarterly thereafter in accordance with the schedule shown in

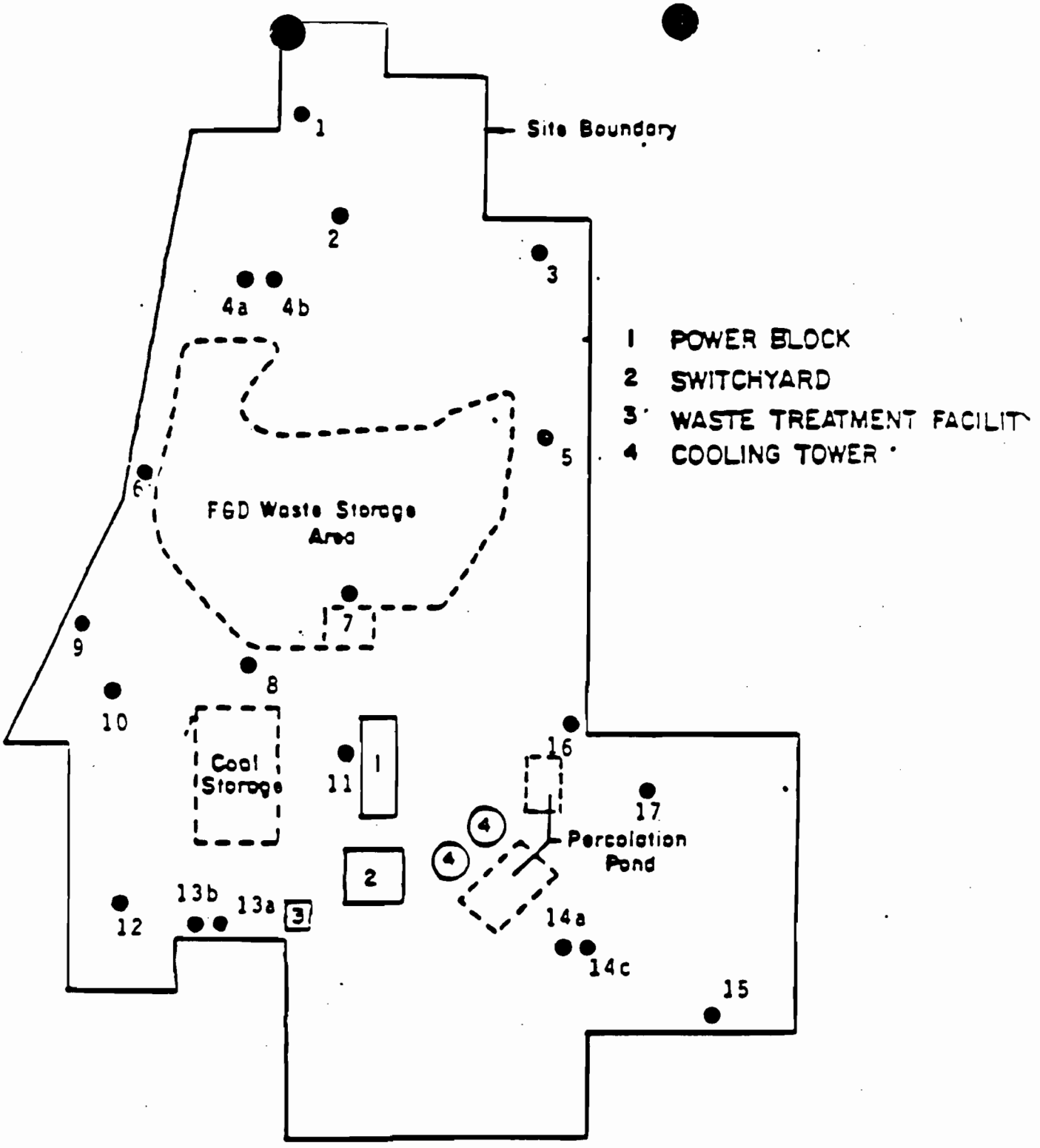


Figure 3 Monitor Well Location Map

Table 1. Results shall be submitted to the Department and the SJRWMD by the 30th day of the month following the month during which such analyses were performed. Testing for the following constituents is required.

Conductance	Nickel
pH	Selenium
Chloride	Chromium
Iron	Arsenic
Cadmium	Beryllium
Zinc	Mercury
Copper	Lead
Sulfate	Gross Alpha
Silver	Barium

5. After the second year of monitoring and periodically thereafter, the Department and the applicant shall review the results of the monitoring program and determine the necessity for modifying or continuing the program.

F. Leachate

1. Zone of Discharge

Leachate from the FGD/sludge landfill, coal storage pile, bottom ash sump, percolation and FGD emergency pond shall not contaminate waters of the State (including both surface and groundwaters) in excess of the limitations of Chapter 17.3, F.A.C., beyond the boundary of the site.

2. Corrective Action

When the groundwater monitoring system shows a violation of the groundwater water quality standards of Chapter 17-3, F.A.C., the appropriate ponds, FGD landfill, or coal pile shall be sealed, relocated or closed, or the operation of the affected facility shall be altered in such a manner as to assure the Department that no violation of the groundwater

Modified per 12/27/91 Letter. "See modifications"

Table 1 Groundwater Monitoring Frequency

	FGD Area Wells 1,2,3,4A,4B,5,6,7,8		Coal Pile Area Wells 9,10,11,12,13A,13B		Perc Pond Area Wells 14A,14C,15,16,17	
	Monthly	Quarterly	Monthly	Yearly	Monthly	Quarterly
Conductance	X	X	X	X	X	X
pH	X	X		X	X	X
Chloride	X	X		X	X	X
Sulfate	X	X		X	X	X
Cadmium		X		X		X
Zinc	X	X		X	X	X
Iron	X	X	X	X	X	X
Copper		X		X		X
Silver		X		X		X
Nickel		X		X		X
Selenium	X	X		X	X	X
Chromium		X		X		X
Beryllium		X		X		X
Mercury	X	X		X	X	X
Lead		X		X		X
Barium		X		X		X
Arsenic	X	X		X	X	X
Gross Alpha		X		X		X

standards will occur beyond the boundary of the site.

IV. Control Measures During Construction

A. Stormwater Runoff

During construction and plant operation, necessary measures shall be used to settle, filter, treat or absorb silt containing or pollutant laden stormwater runoff to limit the suspended solids to 50 mg/l or less at the POD during rainfall periods less than the 10-year, 24-hour rainfall, and to prevent an increase in turbidity of more than 50 Jackson Turbidity Units above background in waters of the state beyond 150 meters from the POD.

Control measures shall consist at the minimum, of filters, sediment traps, barriers, berms or vegetative planting. Exposed or disturbed soil shall be protected as soon as possible to minimize silt and sediment laden runoff. The pH shall be kept within the range of 6.0 to 8.5 at the POD.

B. Sanitary Wastes

Disposal of sanitary wastes from construction toilet facilities shall be in accordance with applicable regulations of the Department and appropriate local health agency. The sewage treatment plant shall be operated in accordance with Chapters 17-3, 17-16, and 17-19, F.A.C. Plans and specifications for the sewage treatment plant shall be submitted to the Departments St. Johns River Subdistrict Manager for review and approval prior to installation.

C. Environmental Control Program

An environmental control program shall be established under the supervision of a qualified person to assure that all construction activities conform to good environmental practices and the applicable conditions of certification.

The permittee shall notify the Department if unexpected harmfull effects or evidence of irreversible environmental damage are detected during construction, shall immediately report to the Department and shall within two weeks provide an analyses of the problem and a plan to eliminate or significantly reduce the harmful effects or damage, and to prevent reoccurrence.

V. Solid Wastes

Solid wastes resulting from construction or operation shall be disposed of in accordance with the applicable regulations of Chapter 17-7, F.A.C. The permittee shall submit a program for approval but outlining the methods to be used in handling and disposal of solid wastes indicating at least methods for erosion control, covering, vegetation and quality control.

Open burning in connection with land clearing shall be in accordance with Chapter 17-5, F.A.C. No additional permits shall be required, but the Division of Forestry shall be notified prior to burning. Open burning shall not occur if the Division of Forestry has issued a ban on burning due to fire hazard conditions.

VI. Operation Safeguards

The overall design, layout, and operation of the facilities shall be such as to minimize hazards to humans and the environment. Security control measures shall be utilized to prevent exposure of the public to hazardous conditions. The Federal Occupational Safety and Health Standards will be complied with during construction and operation. The Safety Standards specified under Section 440.56, F.S., by the Industrial Safety Section of the Florida Department of Commerce will also be complied with.

VII. Screening

The permittee shall provide screening of the site through the use of aesthetically acceptable

Best Available Copy

structures, vegetated earthen walls and/or existing or planted vegetation.

VIII. Potable Water Supply System

The potable water supply system shall be designed and operated in conformance with Chapter 17-22, F.A.C. Information as required in 17-22.108 shall be submitted to the Department prior to construction and operation. The operator of the potable water supply system shall be certified in accordance with Chapter 17-16, F.A.C.

... Transformer and Electric Switching Gear

The foundations for transformers, capacitors, and switching gear necessary for Seminole Units 1 and 2 to the existing distribution system shall be constructed of an impervious material and shall be constructed in such a manner to allow complete collection and recovery of any spills or leakage of oily, toxic, or hazardous substances.

X. Toxic, Deleterious, or Hazardous Materials

The spill of any toxic, deleterious, or hazardous materials shall be reported in the manner specified by Condition XV.

XI. Construction and Emergency Maintenance Activities in Waters of the State.

1. No construction on sovereignty submerged lands shall commence without obtaining lease or title from the Department of Natural Resources.

2. Construction of intake and discharge structures should be done in a manner to minimize turbidity. Turbidity screens should be used to prevent turbidity in excess of 50 JTU above background beyond 150 meters from the dredging, pile driving or construction site.

3. Dredging of the intake channel and discharge pipe trench should be performed by hydraulic dredge (small "mudcat" type

is suitable): clamshell or other excavating equipment is satisfactory behind cofferdams or other turbidity control devices.

4. All spoil shall be piped hydraulically or trucked to an upland disposal site of sufficient capacity to retain all material. The discharge pipe trench should be refilled with clean sand sized material.

5. Effective stabilization of submerged bottom sediments at the discharge pipe exist should be achieved and maintained during the period of operation by the placement of riprap or other suitable material.

XII. FGD/Sludge Landfill and Coal Pile

Adequate geophysical testing shall be conducted to determine if solution cavities are present under the landfill area. If such cavities are located, such cavities shall be sealed off and stabilized.

The proposed FGD sludge landfill area shall be monitored and studied pursuant to a detailed groundwater testing and monitoring program as defined in Condition III E.

The results of the program will be used by the Department in determining whether Seminole has affirmatively demonstrated that Florida Water Quality Standards (17-3 F.A.C.) will not be violated beyond the site boundary.

If the Department determines that Seminole has failed to affirmatively demonstrate that Florida Water Quality Standards (17-3 F.A.C.) will not be violated, Seminole shall present to the Department, within 90 days of such determination, a plan of correction, (which may include, if appropriate, an impermeable liner) for review and approval by the Department, and for timely implementation by Seminole.

During the initial years of operation of Unit 1, but not to exceed five years from start up of Unit 1, a

FGD sludge disposal test and evaluation program shall be implemented in accordance with the program outline submitted to the Department on April 27, 1979 as attached and incorporated herein as Attachment 1. During the test program, any FGD sludge not utilized in the program shall be fixed so as to achieve an ultimate permeability not greater than 7x10-7 cm/sec and shall be disposed of in a manner and located so as to not interfere with the sludge testing program.

Upon completion of the test and evaluation program Seminole shall submit a proposed method of FGD sludge disposal to the Department for Review. The Department shall indicate its approval or disapproval of the program within 60 days of receipt. Seminole shall implement the approved program as soon as practical upon receipt of approval from the Department. Should the program be disapproved by the Department Seminole shall fix the FGD sludge so as to achieve a permeability not greater than 1x10-7 cm/sec and place it with the bottom layer at least eight feet thick or line it with an impermeable liner.

Upon initiation of FGD sludge disposal, a quality control program shall be implemented to insure that the permeability of the FGD sludge does not exceed prescribed levels. Construction of perimeter berms of "Fixed" FGD sludge, if any, shall be in conformance with the provisions of Chapter 17-9, F.A.C., regarding earthen dams.

XIII. Transmission Lines

Directly associated transmission lines shall be constructed and maintained in a manner to minimize environmental impacts in accordance with Chapter 403, F.S.

A. Construction

1. Filling and construction in waters of the State shall be minimized to the extent practicable. No such activities shall take place without obtaining lease or title from the Department of Natural Resources.

2. Placement of fill in wetland areas shall be minimized by spanning such areas with the maximum transmission lines span practicable.

3. Construction and access roads should avoid wetlands and be located in surrounding uplands. Any fill required in wetlands for construction but not required for maintenance purposes shall be removed and the ground restored to its original contours after transmission line placement.

4. Keyhole fills from upland areas are preferable to a single road and should be oriented as nearly parallel to surface water flow lines as possible.

5. Sufficient culverts shall be placed through fill causeways to maintain sheet flow. The number and locations of such culverts will be determined in the field by consultation with DER field inspectors.

6. Maintenance roads shall be planted with native species to prevent erosion and subsequent water quality degradation.

7. Construction activities should proceed as much as possible during the dry season.

8. Turbidity control measures, where needed, shall be employed to prevent violation of water quality standards.

9. Good environmental practices as described in Environmental Criteria for Electric Transmission Systems as published by the U.S. Department of Interior and the U.S. Department of Agriculture should be followed.

10. Any archaeological sites discovered during construction of the transmission lines shall be disturbed as little as possible and such discovery shall be communicated to the Department of State,

Division of Archives, History and Records Management.

B. Maintenance

1. Vegetative removal for maintenance should be carried out in the following manner:

Vegetative clearing operations to be carried out within the corridor should follow the general standards for clearing rights-of-way for overhead transmission lines and follow good environmental practices as described in environmental criteria for Electric Transmission Systems, as published by The U.S. Department of The Interior and The U.S. Department of Agriculture, thus preserving immature tree species along the peripheries of the right-of-way. These standards define the zone that shall be cleared of all tree growth as the area between structures 10 ft. to either side of the outside conductor. The remainder of the right-of-way from the cleared area to the right-of-way limit shall be screened. This translates to mean that only trees in excess of 10 ft. in height would be removed from the outer zone except where location of the access roads necessitates complete clearing.

2. Approved Chemicals or herbicides may be used for vegetation control along the transmission line without prior approval of the Department.

XIV. Change in Discharge

All discharges or emission authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any pollutant not identified in the application, or any discharge more frequent than, or at a level in excess of that authorized herein, shall constitute a violation of the certification. Any anticipated facility expansions, production increases, or process modification which will result in new, different or increased discharges or expansion in steam

generating capacity will require a submission of a new or supplemental application pursuant to Chapter 403, Florida Statutes.

XV. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any limitation specified in this certification, the permittee shall notify the St. Johns River Subdistrict Manager of the Department by telephone during the working day during which permittee becomes aware of said noncompliance and shall confirm this situation in writing within seventy-two (72) hours of first becoming aware of such conditions, supplying the following information:

a. A description and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying event.

XVI. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification. Such systems are not to be bypassed without prior department approval, except, during periods of when light oil is used for ignition, the FGD system may be bypassed.

XVII. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact resulting from noncompliance with any limitation specified in this certification, including but not limited to such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying event.

XVIII. Right of Entry

The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which records are required to be kept under the terms and conditions of this permit; and

b. To have access to and copy all records required to be kept under the conditions of this certification; and

c. To inspect and test any monitoring equipment or monitoring method required in this certification and to sample any discharge or pollutants, and

d. To assess any damage to the environment or violation of ambient standards.

XIX. Revocation or Suspension

This certification may be suspended or revoked pursuant to Section 403.512, Florida Statutes, or for violations of any Condition or certification.

XX. Civil and Criminal Liability

This certification does not relieve the permittee from civil or criminal responsibility or liability for noncompliance with any conditions of this certification, applicable rules or regulations of the Department, or Chapter 403, Florida Statutes, or regulations thereunder.

Subject to Section 403.511, Florida Statutes, this certification shall not preclude the institution of any legal action or relieve the permittee from any responsibilities or penalties established pursuant to any other applicable State Statutes or regulations.

XXI. Property Rights

The issuance of this certification does not convey any property rights in either real or personal property tangible or intangible, nor any exclusive priviledges, nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations. The applicant will obtain title, lease or right of use from the State of Florida, to any sovereign submerged lands occupied by the plant, transmission line structures, or appurtenant facilities.

XXII. Severability

The provisions of this certification are severable, and if any provision of this certification, or the application of any provision of this certification to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of the certification shall not be affected thereby.

XXIII. Definitions

The meaning of terms used herein shall be governed by the definitions contained in Chapter 403, Florida Statutes, and any regulation adopted pursuant thereto. In the event of any dispute over the meaning of a term used in these general or special conditions which is not defined in such statutes or regulations, such dispute shall be resolved by reference to the most relevant definitions contained in any other state or federal statute or regulation or, in the alternative by the use of the commonly accepted meaning as determined by the Department.

XXIV. Review of Site Certification

The certification shall be final unless revised, revoked or suspended pursuant to law. At least every five years from the date of issuance of this certification or any National Pollutant Discharge Elimination System Permit issued pursuant to the Federal Water Pollution Control Act Amendments of

1972, for the plant units, the Department shall review all monitoring data that has been submitted to it during the proceeding five-year period, for the purposes of determining the extent of the permittee's compliance with the conditions of this certification of the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the permittee. Such results will be repeated at least every five years thereafter.

XXV. Modification of Conditions

The conditions of this certification may be modified in the following manner:

a. The Board hereby delegates to the Secretary the authority to modify, after notice and opportunity for hearing, any conditions pertaining to monitoring, testing and evaluation programs, sampling, groundwater, mixing zones, zones of discharge or variances to water quality standards, or location of transmission line corridors within areas already approved at the land use hearing.

b. All other modifications shall be made in accordance with Section 403.516, Florida Statutes.

BEST AVAILABLE COPY

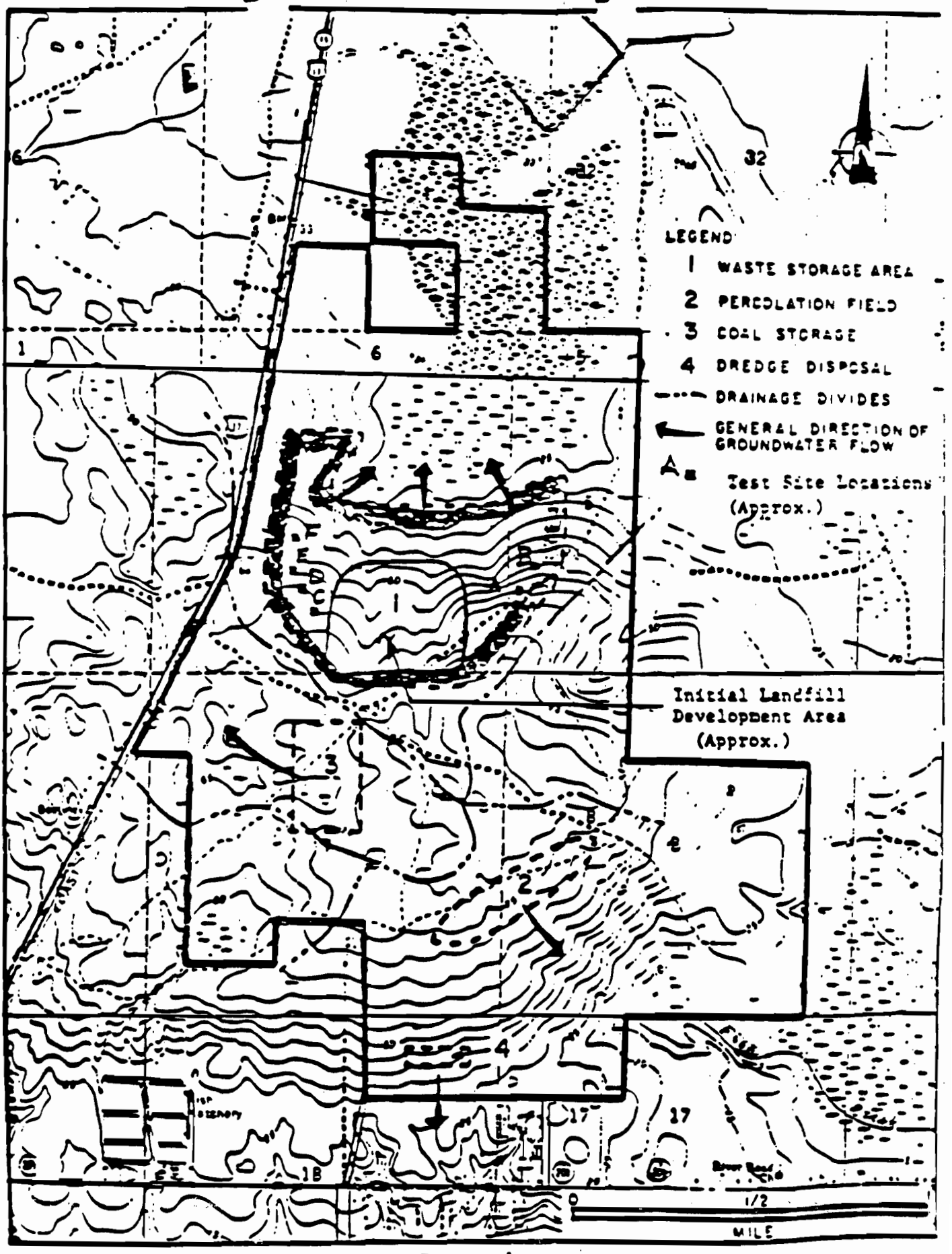
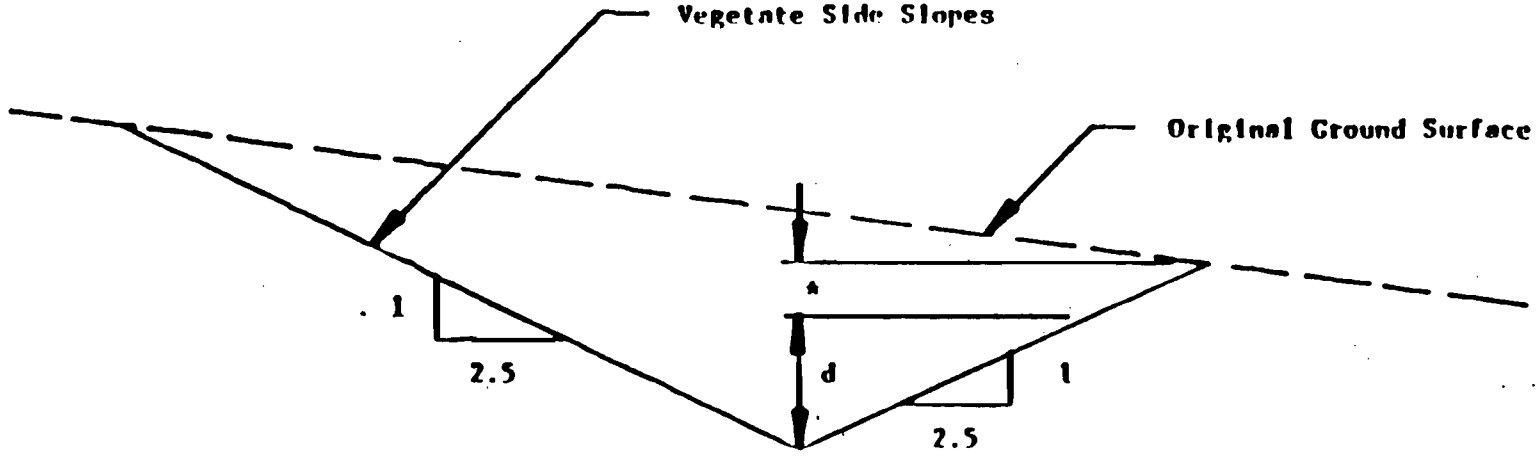


Figure A



d = Flow Depth

* = Freeboard, 1'-0 min.

Figure B

TYPICAL CROSS SECTION

DIVERSION CHANNEL.

NO SCALE

Best Available Copy

PROPOSED PROGRAM FOR MONITORING AND EVALUATING THE GEOTECHNICAL AND ENVIRONMENTAL CHARACTERISTICS OF FGD SLUDGE AND ASH DISPOSAL

Seminole Electric Cooperative, Inc. (SECI) wishes to demonstrate to the Florida Department of Environmental Regulation (DER) and the Environmental Protection Agency (EPA) that it has the capability to dispose of the various power plant waste materials which will be produced at Seminole Units 1 and 2 in an environmentally acceptable manner. To ensure this environmentally acceptable disposal, SECI intends to include in its power plant sub-systems, a waste treatment system capable of processing all of the FGD sludge, fly ash and bottom ash produced by both Seminole Units 1 and 2. This waste treatment system will utilize accepted pozzolanic technology to chemically fix the power plant waste products.

Sludge and fly ash processed through the plant using the fixation process shall be defined herein as "stabilized" material. Sludge and fly ash blended within the plant with-fixation additives shall be defined herein as "unstabilized" material.

The primary emphasis of the program is to evaluate the handleability, economics, structural stability and environmental acceptability of unstabilized fly ash and sludge (either unoxidized or oxidized) mixtures, and to develop a long term disposal plan in line with sound engineering principles acceptable to the DER and the EPA.

Attached please find our outline for the proposed program, Exhibit II, and Figures A through E.

ATTACHMENT 1

OUTLINE

PHASE I - DESIGN AND DEVELOPMENT OF MONITORING PROGRAM

A. Develop Disposal Concepts

- Unstabilized disposal
- Encapsulation
- Selected stabilization
- Total stabilization

B. Select Disposal Concepts for Test Cell Development and Monitoring

- Unstabilized disposal
- Selected stabilization and encapsulation of oxidized sludge and ash.
- Selected stabilization and encapsulation of unoxidized sludge and ash
- Total stabilization of oxidized or unoxidized sludge and ash

C. Design Test Cells and Monitoring Program for Concept Evaluation - See Figures A thru E

- Establish monitoring point locations
- Design test cells
- Develop field and laboratory test program

PHASE II - IMPLEMENTATION AND EVALUATION OF MONITORING PROGRAM

A. Monitoring, Quality Control and Testing Program

- Establish physical and chemical characteristics of disposal materials
- Monitor runoff and leachate
- Determine in situ material characteristics with regard to density, strength, permeability, stability, etc.

B. Establish Effect of Various Disposal Concepts on Operations

- Equipment and manpower requirements
- Operating efficiency
- Seasonal variations
- Operational difficulties

PHASE III - EVALUATION OF SHORT AND LONG TERM EFFECTS OF VARIOUS CONCEPTS

A. Environmental Acceptability

- Meets or exceeds Florida water quality standards

B. Structural Integrity

- Immediate and long term stability

C. Operational Feasibility

- Potential for reclaimation and future land use

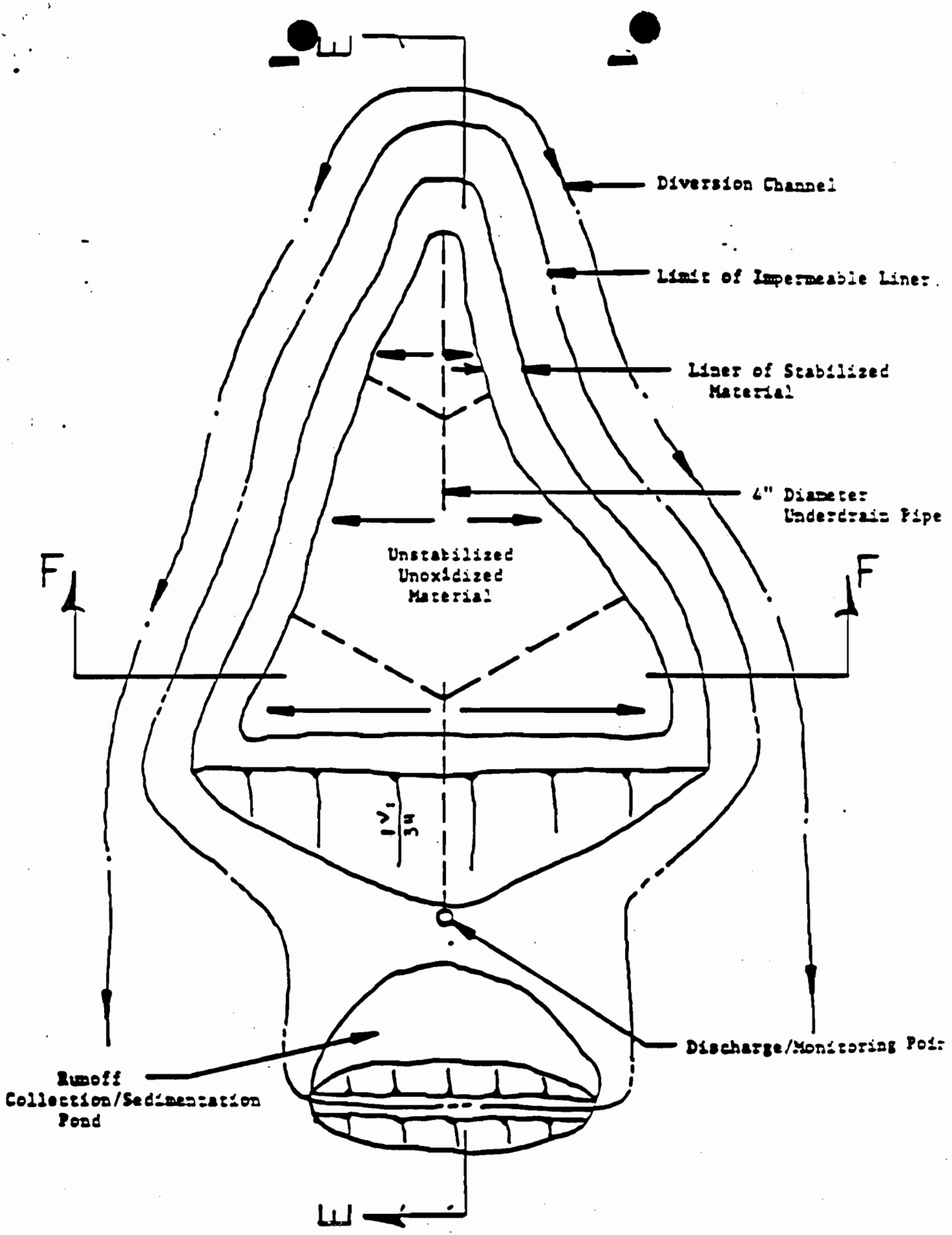


Figure C
TEST SITE C
SITE PLAN
NO SCALE

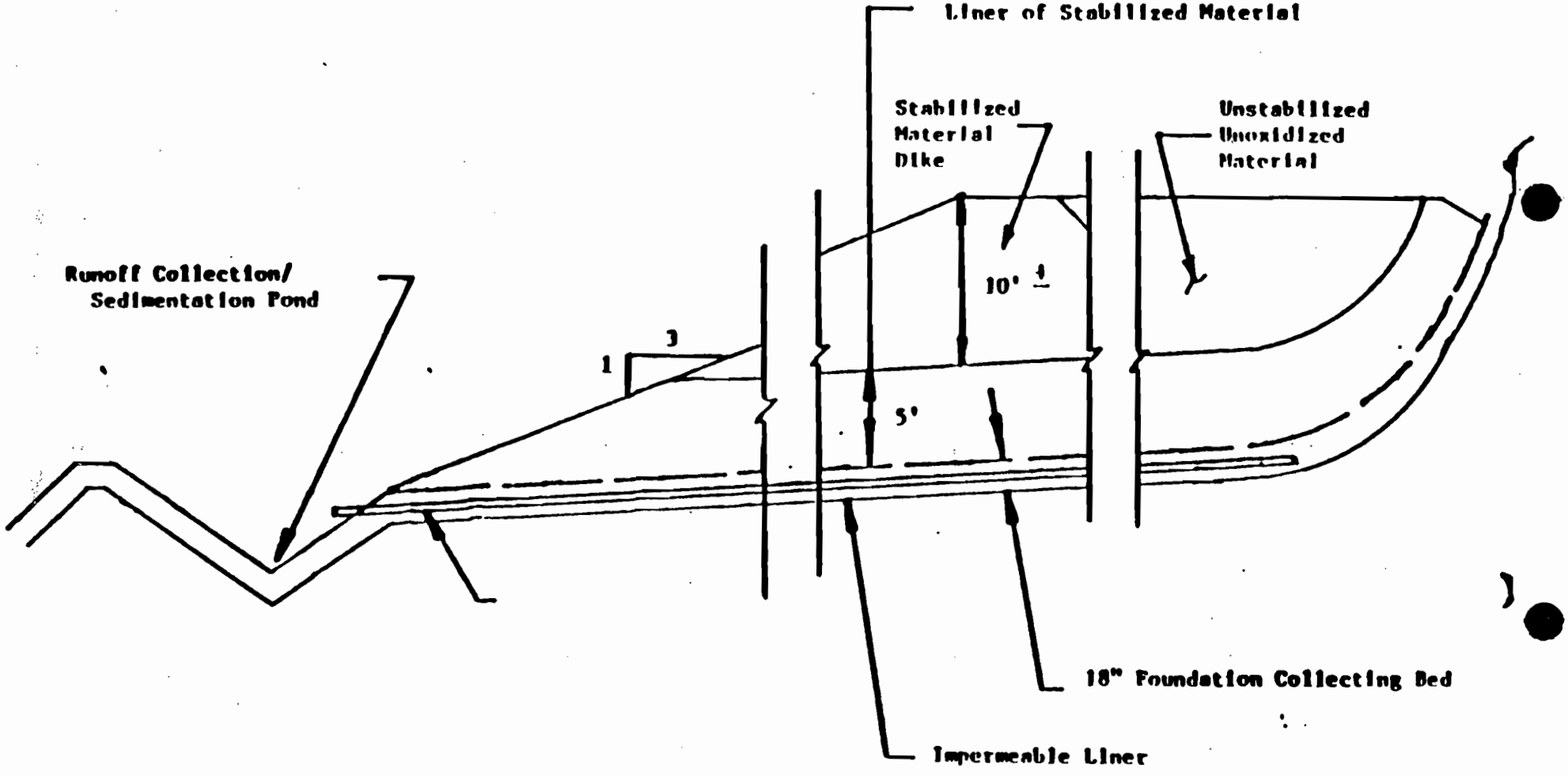


Figure D

SECTION EE

TYPICAL CROSS SECTION

NO SCALE

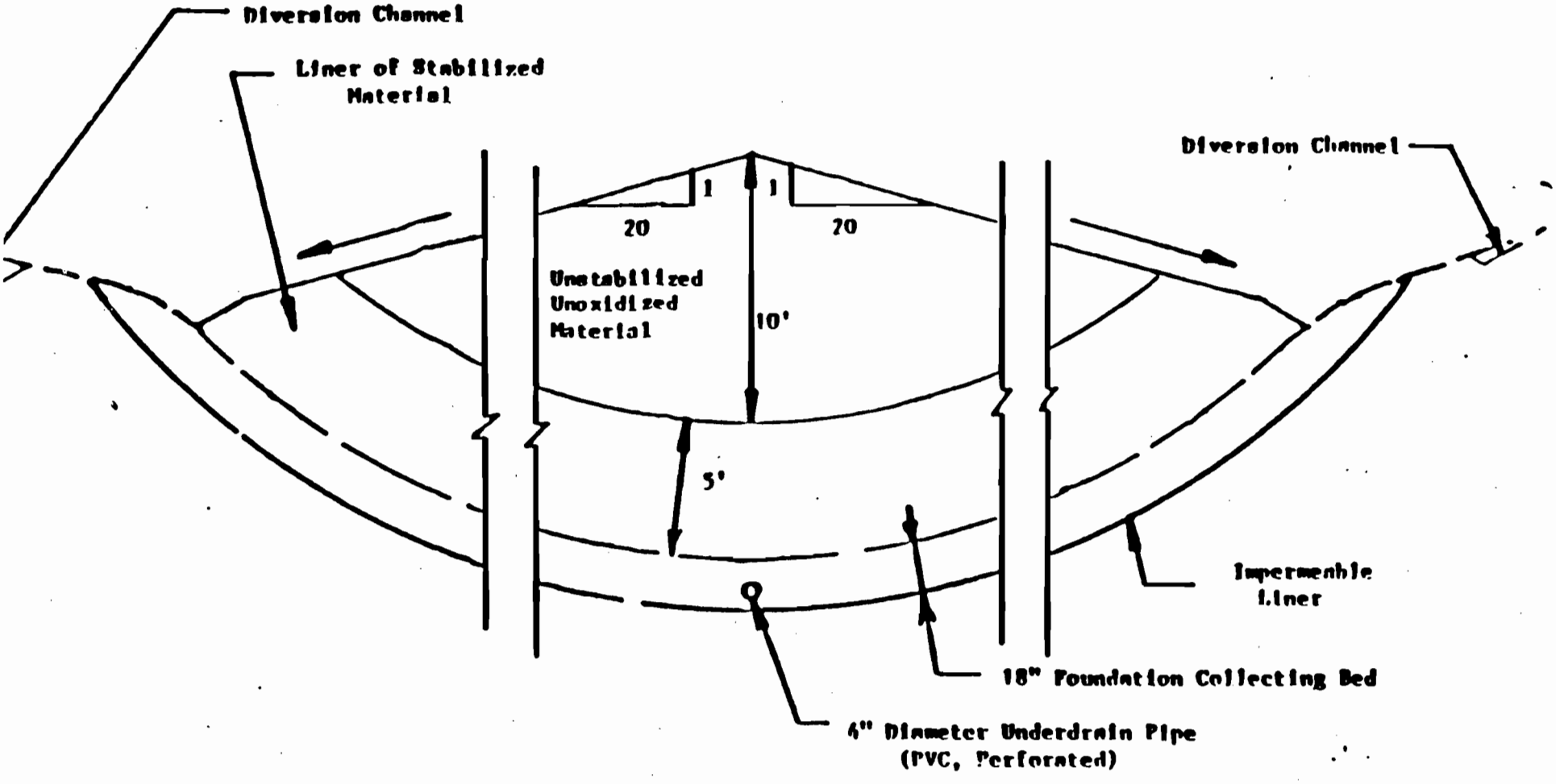


Figure E

SECTION FF

TYPICAL CROSS SECTION

NO SCALE

Effluent Limitations coal pile runoff deletion.

RECEIVED DEC 2 1992

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In Re:	)
	)
Seminole Electric Cooperative, Inc.	)
Seminole Power Plant Units 1 & 2	)
Power Plant Certification	)
Modification Request	)
No. PA 78-10	)
Putnam County, Florida	)
	)

FINAL ORDER

MODIFYING CONDITIONS OF CERTIFICATION

The Department of Environmental Regulation after notice and opportunity for hearing modifies the Conditions of Certification for the Seminole Electric Cooperative, Seminole Power Plant pursuant to the Florida Electrical Power Plant Siting Act Section 403.516(1), Florida Statutes, and Condition XXV, Modification of Conditions, which delegates authority to modify conditions to the Department.

On September 11, 1992, Seminole Electric Cooperative, Inc. submitted a petition to the Department requesting certain modifications of the Conditions of Certification for the above referenced facility.

On October 1, 1992, Notice of Proposed Modification of Power Plant Certification was served on all parties, and a Notice of Proposed Modification of Power Plant Certification was published in the Florida Administrative Weekly. No hearing was requested, therefore the Department adopts the proposed agency action as final.

Accordingly, the Department pursuant to Section 403.516(1), Florida Statutes (Supp 1990), modifies the Conditions of Certification as follows:

12. Effluent Limitations

a. The following instantaneous maximum effluent limitations shall apply for cadmium, mercury, lead and zinc at the locations specified:

(i) Cooling blowdown - concentrations shall not exceed four times the concentrations present in the river at Applicant's intake structure, or not exceed Class III surface water quality standards, whichever is higher.

~~(ii) Coal/limestone storage runoff concentrations shall not exceed:~~

~~cadmium 0.11 mg/l~~

~~mercury 0.0022 mg/l~~

~~lead 0.11 mg/l~~

~~zinc 1.76 mg/l~~

(ii) ~~(iii)~~ bottom ash sluice blowdown - concentrations shall not exceed the unweighted sum of the amount per liter described in (i) aboved plus the following amounts per liter:

cadmium.....0.11 mg/l

mercury.....0.0055 mg/l

lead.....0.11 mg/l

zinc.....1.1 mg/l

b. no change

Any party to this Order has a right to seek judicial review of this Order pursuant to Section 120.67, Florida Statutes by the Filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and by filing a copy of the Notice of the Notice of Appeal accompanied by the Applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Order is filed with the cleark of the Department.

DONE AND ORDERED this 25th day of November 1992 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner
Secretary

Certificate of Service

I hereby certify that a copy of the Petition for Modification of the Seminole Electric Cooperative, Seminole Power Plant Site Certification was sent to the following parties by United States mail on November 30, 1992.

Wayne Flowers, Esquire
St. Johns River Water Mngm. Dist.
Post Office Box 1429
Palatka, Florida 32178-1429

Steve Pfeiffer, General Counsel
Department of Community Affairs
2740 Center View Drive
Tallahassee, FL 32399-2100

Michael Palecki, Esquire
Florida Public Service Commission
Fletcher Building
101 East Gaines Street
Tallahassee, FL 32399-0863

James S. Alves, Esquire
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314

Mike Opalinski
Manager Environmental Affairs
Seminole Electric Cooperative, Inc.
Post Office Box 272000
Tampa, Florida 33688-2000

Robert Vandiver, Esquire
Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Kathryn Funchess, Esquire
Department of Community Affairs
2740 Centerview Drive
Tallahassee, FL 32399-2100

Mr. Henry Dean
Executive Director
St. Johns River Water Mgmt. Dist.
P.O. Box 1429
Palatka, FL 32178

Thornton J. Williams, Esquire
Department of Transportation
605 Suwannee Street
Mail Station 58
Tallahassee, FL 32399-0450

Mr. Ludie Shipp, Chairman
Board of County Commissioners
Columbia County Courthouse
Post Office Drawer 1529
Lake City, FL 32055

Mr. Samuel Taylor
Board of County Commissioners
Putnam County
Post Office Box 758
Palatka, FL 32178

Lynne C. Capehart, Esquire
1601 NW 35th Way
Gainesville, FL 32605

Mr. Marvin Pritchett,
Chairman
Board of County Commissioners
Union County
Post Office Box 311
Lake Butler, FL 32054

Stephen P. Lee
Marion County Attorney
601 SE 25th Avenue
Ocala, FL 32671

Mark Scruby
Clay County Attorney
Post Office Box 1366
Green Cove Springs, FL 32043

Mr. Charles Harwood
Withlacoochee Regional
Planning
Council
1241 SW Tenth Street
Ocala, FL 32674

Mr. Charles F. Justice
N Central Florida Regional
Planning Council
235 S Main Street, Suite 205
Gainesville, FL 32601

Mr. Brian Teeple
NE Central Florida Regional
Planning Council
8649 Baypine Road, Suite 110
Jacksonville, FL 32256

William Phelan, City Attorney
City of Ocala
101 SW Third Street
Ocala, FL 32670

The Honorable Gerald T. Whitt
City of Lake City
Post Office Box 1687
Lake City, FL 32055

Don Wright, Esquire
Board Counsel
St. Johns River Water
Management District
Post Office Box 2828
Orlando, FL 32802

Mr. Jerry Scarborough
Executive Director
Suwannee River Water
Management
District
Route 3, Box 64
Live Oak, FL 32060

Mr. W. W. Jernigan, Chairman
Board of County Commissioners
Suwannee County Courthouse
200 South Ohio Avenue
Live Oak, FL 32060

Richard T. Donelan
Assistant General Counsel
State of Florida Department
of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

Best Available Copy

REC'D ENV.
MAR 29 1991
FILE COPY

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In Re:

Seminole Electric Cooperative, Inc.
Seminole Power Plant
Power Plant Certification
Modification Request
No. PA 78-10
Putnam County, Florida

FINAL ORDER MODIFYING CONDITIONS
OF CERTIFICATION

On August 29, 1990, Seminole Electric Cooperative, Inc. submitted a request to modify the Conditions of Certification for the Seminole Power Plant relating to the construction and operation of a rail car maintenance and surface coating facility at the Seminole Power Plant site. The requested modification was submitted pursuant to Section 403.516, F.S., to the Department and parties to the original 1978-1979 certification proceedings.

On November 9, 1990, a Notice of Request for Modification of Power Plant Certification was served on all parties with a provision that a hearing would be held if requested on or before December 24, 1990. No hearing was requested. No party has objected to the proposed modification:

THEREFORE, IT IS ORDERED:

The Department hereby modifies the Conditions of Certification for the Seminole Power Plant as follows:

Condition XXVI. is added as follows:

XXVI. **Rail Car Maintenance Facility**

The rail car maintenance and surface coating facility shall be designed, constructed and operated in conformance with chapters 17-2, 17-25, and 17-302, F.A.C. and the following limitations:

A. Visible Emissions - shall not exceed 20% opacity.

B. VOC Emissions - shall not exceed 37.7 lbs/hr. or 7.84 T/year.

C. Particulate Emissions - Unconfined particulate emissions from abrasive blasting shall be controlled as required by Section 17-2.610(3)(c), F.A.C., using the

following precautions:

1. Only the interior of the railcars shall be cleaned.

2. The cover and the partial enclosure of the shelter will act as a windbreak to minimize the amount of residual particulate that becomes airborne.

D. Stormwater Runoff - shall be collected in existing runoff ditches and routed to percolation/evaporation areas on site.

E. Wastewater - There shall be no discharge of wastewater form the maintenance facility site.

F. sanitary Waste - Shall be disposed of in accordance with the applicable substantive requirements of chapter 10D-6, F.A.C.

G. Water - The associated drinking water system shall comply with the substantive requirements of chapters 10-D-4, 17-550 and 17-555, F.A.C. consumptive use of groundwater shall be governed by the non-procedural provisions of 40C-2.381, F.A.C. and Section 18.0.1, Part III, "Applicants Handbook consumptive Uses of Water."

NOTICE OF RIGHTS

Any party to this Order has the right to seek judicial review of this Order pursuant to Section 120.68, Florida Statutes by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of the General counsel, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the appropriate filing fees with the appropriate district court of appeal. The Notice of Appeal must be filed within 30 days from the date of the Final Order is filed with the clerk of the Department.

DONE AND ORDERED this 26 day of March, 1991, in Tallahassee, Florida

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner

CAROL M. BROWNER
SECRETARY

Certificate of Service

I hereby certify that a copy of the petition of Modification of the Seminole Power Plant Site Certification was sent to the following parties by United States mail on March 26, 1991.

Ms. Kathryn Funchess
Deputy General Counsel
Department of Community Affairs
2740 Center View Drive
Tallahassee, FL 32399-2100

Mr. Brian Teeple
Northeast Florida Regional Planning Council
8649 Baypine Road, #110
Jacksonville, FL 32256

Mr. Michael Palecki
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32314

Mr. Samuel Taylor
Board of County Commissioners
Putnam County
P.O. Box 758
Palatka, FL 32178

Mr. Jim Alves
Hopping Boyd Green & Sams
P.O. Box 6526
Tallahassee, FL 32314

Ms. Lynne C. Capehart
1601 N.W. 35th Way
Gainesville, FL 32605

Ms. Susan Clark
Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Mr. Henry Dean
Executive Director
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178

Mr. G. Steven Pfeiffer
Department of Community Affairs
2740 Centerview Drive
Tallahassee, FL 32399-2100

Mr. Stephen P. Lee
Marion County Attorney
601 S.E. 25th Avenue
Ocala, FL 32671

Mr. Charles Harwood
Withlacoochee Regional Planning Council
1241 S.W. Tenth Street
Ocala, FL 32674

Mr. Thornton J. Williams
Department of Transportation
605 Suwannee Street
Mail Station #58
Tallahassee, FL 32399-0450

Mr. Charles F. Justice
North Central Florida Regional Planning Council
235 South Main Street
Suite 205
Gainesville, FL 32601

Mr. Ludie Shipp, Chairman
Board of County Commissioners
Columbia County Courthouse
P.O. Drawer 1529
Lake City, FL 32055

Mr. Don Wright
Board Counsel
St. Johns River Water
Management District
P.O. Box 2828
Orlando, FL 32802

Mr. Mark Scruby
Clay County Attorney
P.O. Box 1366
Green Cove Springs, FL 32043

Mr. Marvin Pritchett,
Chairman
Board of County Commissioners
Union County
P.O. Box 311
Lake Butler, FL 32054

Mr. William Phelan
City Attorney
City of Ocala
101 S.W. Third Street
Ocala, FL 32670

Mr. Maxie Carter, Jr.,
Board of County Commissioners
Bradford County
P.O. Drawer B
Starke, FL 32091

The Honorable Gerald T. Whitt
City of Lake City
P.O. Box 1687
Lake City, FL 32055

Mr. W.W. Jerenign, Chairman
Board of County Commissioners
Suwannee County Courthouse
200 South Ohio Avenue
Live Oak, FL 32060

Mr. Jerry Scarborough
Executive Director
Suwannee River Water Management
District
Route 3, Box 64
Live Oak, FL 32060

Hamilton S. Oven, Jr.
for Richard Donelan
Assistant General Counsel

State of Florida Department
of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

A/

COPY

September 29, 1980

Mr. Hamilton S. Oven
Fl. Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

RE: Particulate Emissions Control
Coal Handling Equipment

Dear Buck:

In compliance with Section I.A.3.b of Seminole's Conditions of Certification, please find the following enclosed documents concerning particulate emissions control on the coal handling equipment:

1. A letter dated August 8, 1980 from the Dravo Corporation to Burns & Roe, Inc.

2. A preliminary drawing of the coal handling system showing relative locations of controls.

3. Specification for Dust Suppression Systems.

4. Specification for Dust Collection Equipment and Dust Collection Ductwork, Hoods and Chutes.

If you have any questions concerning any of the above material, please contact me.

Sincerely,

Mike Opalinski
Manager of Environmental Affairs

MO/11f
Enclosures

HOPPING BOYD GREEN & SAMS
ATTORNEYS AND COUNSELORS
123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500

CARLOS ALVAREZ
BRIAN H. BIBEAU
ELIZABETH C. BOWMAN
WILLIAM L. BOYD, IV
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
WILLIAM D. PRESTON
CAROLYN S. RAEPPLE
GARY R. SAMS
ROBERT R. SMITH, JR.

JAMES S. ALVES
KATHLEEN BLIZZARD
THOMAS M. DeROSE
KATHLEEN E. MOORE
RICHARD W. MOORE
LAURA BOYD PEARCE
DAVID L. POWELL
DOUGLAS S. ROBERTS
CECELIA C. SMITH
CHERYL G. STUART

OF COUNSEL
W. ROBERT FOKES

March 24, 1989

Mr. Hamilton S. Oven, Jr., P.E.
Administrator, Siting Coordination Section
Department of Environmental Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Seminole Electric Cooperative, Inc./Units 1 & 2/PA 78-10/Conditions of Certification

Dear Mr. Oven:

As you know, the Site Certification for Seminole Units 1 & 2 was modified by Secretary Twachtmann's Order dated October 12, 1988. In order to make it easier for the Department and Seminole to refer to the Site Certification Conditions in the future, I have prepared a document that reflects all of the Conditions of Certification as modified in 1988. A copy of that document is attached hereto for your review.

The attached document should accurately reflect the original conditions as modified with the exception of a few scrivenor's errors. These are as follows:

1. Condition II. A. 4. on page 6 - the third sentence should begin with the word "Operational" rather than "Preoperational"; the second line of that same sentence should refer to 40 CFR instead of 40 CFT; the third sentence of the paragraph should contain the words "and stack wash" as did the original certification;

2. Condition II. A. 12. a. (i) - the phrase "at the time of" was repeated in the Secretary's Order. That unintentional duplication is removed in the attached; and

3. Condition II. B. 1. - The footnote in the Secretary's Order deleted both footnotes to the Monitoring Frequency Entry. The attached reinserts the second footnote.

I believe that all other provisions of the attached are a correct reflection of the original Order as modified, and corrected as discussed above. Please review this and let me know whether you agree that the Department and Seminole can agree that the attached constitute the correct compiled Conditions of Certification for the plant.

Sincerely,

Bill

William H. Green

WHG/wrn

Enclosure

cc: Mike Roddy

SEMINOLE ELECTRIC COOPERATIVE INCORPORATED

December 27, 1991

Ms. Rita Felton
Industrial Waste Engineer
FDER-Northeast District
Suite B-200
7825 Baymeadows Way
Jacksonville, Florida 32256-7577

RE: OCTOBER 7, 1991 INDUSTRIAL WASTE/GROUNDWATER MONITORING PROGRAM INSPECTION

Dear Ms. Felton,

Seminole Electric Cooperative, Inc. (SECI) received the results of the Industrial Waste Compliance Biomonitoring Inspection, Toxic Sampling Inspection and Groundwater Monitoring Inspection on December 17, 1991. As we agreed to in our telephone conversation on December 18, 1991, Seminole response was extended to December 30, 1991, to allow adequate time to respond to the inspection report results.

The following are the responses to the issues noted in your report:

1. Thermometer in TSS oven not placed in sand.

   Response: The SECI Plant Chemist has researched applicable Standard Methods including EPA-600/4-79-20, Methods for Chemical Analysis of Water and Wastewater, and can find no requirement for placing the TSS oven thermometer in glass beads or sand.

   Due to the limited space available in the TSS oven, SECI chemists are continuing to investigate the feasibility of following your suggestion. We would appreciate receiving any material which references the above method as standard laboratory practice.

2. Department requests submittal of SECI split sample analytical results.

   Response: Split samples taken by SECI during the October inspection were retained in case a problem was detected by the Department. Since no problems were encountered, no analysis were performed.

16313 NORTH DALE MABRY HIGHWAY • P.O. BOX 272000 • TAMPA, FLORIDA 33688-2000 • (813) 963-0994

Groundwater

1. Gross Alpha analysis for second and third quarters 1991 missing.

   Response: As previously discussed, second quarter Gross Alpha analysis were submitted on the May monthly report. Third quarter analysis were conducted in August but due to an error, was not typed on the monthly report. Laboratory analysis sheets and an August monthly report are attached.

   SECI does take extremely strong exception to the fact that this error should label the entire groundwater sampling procedure as marginal as recorded on the Wastewater Compliance Inspection Report. This is a reporting error and not a deficiency in the sampling procedure. Seminole has installed well wizards on all groundwater monitoring wells to insure the integrity of samples taken and which we feel is a vast improvement over manual sampling. The marginal rating on the sampling procedure is unjustified.

2. In January, 1992 all laboratory sampling and analysis must be approved as required in 17-160 FAC.

   Response: The QA/QC plan required by 17-160 FAC has been submitted to the Department's Quality Assurance Section in Tallahassee.

3. Future Monitoring results must be submitted on DER Form 17-1.216 (2).

   Response: SECI will begin submitting groundwater monitoring reports on the DER form beginning in January 1992.

4. Monitoring reports must be submitted within fifteen days after analysis are received.

   Response: Condition of Site Certification III.E.4 requires groundwater monitoring reports to be submitted by the 30th day of the month following the month during which such analysis were performed. SECI will continue to follow this reporting schedule.

5. Facility and individual monitoring well GMS numbers must be submitted on the DER reporting form.

   Response: SECI will begin submitting the GMS numbers in January 1992.

6. Storet codes for each parameter must be submitted on the DER form.

   Response: SECI will submit storet codes beginning January 1992.

7. Provide elevation of monitoring wells to the nearest 0.1 feet.

Response: This information has been submitted previously but will be resubmitted on the January report.

8. Provide information on well installation date, depth and length of monitoring interval.

Response: This information has been previously submitted to the Department as part of the groundwater monitoring plan approval process and verbally to Robert Martin, DER-Northeast District.

9. Provide recent site plan indicating location of all ponds and monitor wells.

Response: This information was provided in early December to Robert Martin.

10. Reduced Monitoring

Response: As allowed by Section III, Table 1 and discussed with Robert Martin, DER-Northeast District beginning in January 1992, SECI will sample and analyze monitoring wells 1-2-3-4A-4C-5-6-7C-8-14A-14C-15-16 and 17 quarterly. Wells 9-10-11-12-13A and 13B will be sampled annually.

If you have any questions concerning this response please do not hesitate to contact me at (813) 963-0994.

Sincerely,

M. P. Opalinski

Mike Opalinski
Manager, Environmental Affairs

Attachment

cc: Peter McGarry - EPA
Mike Tanski - DER Tallahassee

PB:jz

BEST AVAILABLE COPY

Controls for Environmental Pollution, Inc.
P.O. BOX 5351 • Santa Fe, New Mexico 87502 OUT OF STATE 800/545-2188 • FAX-505-982-9589

Controls for Environmental
Pollution, Inc.
P. O. Box 5351
Santa Fe, NM 87502
Attn:
Phone: (505) 982-9841/(800) 545-2188

Seminole Electric Coop., Inc.
P.O. Box 1577
Palatka, FL 32177

Attn: Walt Egan
Invoice Number:

Order #: 91-08-560
Date: 09/11/91 09:47
Work ID: Water (NR)
Date Received: 08/22/91
Date Completed: 09/11/91

SAMPLE IDENTIFICATION

Sample Number	Sample Description	Sample Number	Sample Description
01	W-1 094	C2	W-2 094
03	W-3 094	C4	W-4A 094
05	W-4C 094	06	W-5 094
07	W-6 094	C8	W-8 094
09	W-14A 094	10	W-14C 094
11	W-15 094	12	W-16 094
13	W-17A 094	14	W-18 094

Remainder of sample(s) for routine analysis will be disposed of three weeks from final report date. Sample(s) for bacteria analysis only, will be disposed of immediately after analysis. This is not applicable if other arrangements have been made.

Approved By

...conditions that they are not to be reproduced wholly or in part for advertising and/or other purposes over our signature or in connection with our name without special permission in writing.

BEST AVAILABLE COPY

Controls for Environmental Pollution, Inc.
P.O. Box 5351 • Santa Fe, New Mexico 87502 OUT OF STATE 800/545-8188 • FAX: 505-982-9289

TEST RESULTS BY SAMPLE

Sample: 01A W-1 094 Collected: 08/08/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 02A W-2 094 Collected: 08/08/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 03A W-3 094 Collected: 08/13/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 04A W-4A 094 Collected: 08/08/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 05A W-4C 094 Collected: 08/08/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

BEST AVAILABLE COPY

Controls for Environmental Pollution, Inc.
P.O. BOX 5351 • Santa Fe, New Mexico 87502 OUT OF STATE 800/545-2188 • FAX: 505-982-9289

Order # 91-06-560
09/11/91 09:47

Controls for Environmental

Sample: 06A W-5 094 Collected: 08/14/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 07A W-6 094 Collected: 08/13/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 08A W-8 094 Collected: 08/13/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 09A W-14A 094 Collected: 08/13/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 10A W-14C 094 Collected: 08/14/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

BEST AVAILABLE COPY

Controls for Environmental Pollution, Inc.
P.O. BOX 5351 • Santa Fe, New Mexico 87502 OUT OF STATE 800/545-2188 • FAX - 505-982-9289

Order # 91-08-560 Controls for Environmental
09/11/91 07:47

PAGE.05

Sample: 11A W-15 094 Collected: 08/06/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

Sample: 12A W-16 094 Collected: 08/06/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	3+/-2	2	pCi/liter		

Sample: 13A W-17A 094 Collected: 08/07/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	5+/-2	2	pCi/liter		

Sample: 14A W-18 094 Collected: 08/07/91

Test Description	Result	D.L.	Units	Analyzed	By
Gross Alpha	<2	2	pCi/liter		

DEC 17 '91 15:19 SEMINOLE ELECTRIC

** TOTAL PAGE.05 **

... for advertising and for other purposes over our signature or in connection with our name without special permission in writing

GROUNDWATER MONITORING REPORT/SECI UNITS 1 & 2

NOTE: (-) MEANS LESS THAN, (.) MEANS NO ANALYSIS REQUIRED THIS MONTH

MONTH: AUGUST, 1991

	WELL NUMBERS									
	1	2	3	4A	4C	5	6	7B	8	9
CONSTITUENT										
CONDUCTIVITY (UMHOA/CM)	500	230	50	280	270	100	50	.	50	50
PH	7	6.8	5	7.1	7	6.2	4.7	.	4.8	4.6
CHLORIDE (PPM)	11	12	14	7	7	17	9	.	9	.
SULFATE (PPM)	-1	12	-1	-1	-1	7	12	.	6	.
ARSENIC (PPM)	-0.002	-0.002	-0.002	-0.002	-0.002	-0.002	-0.002	.	-0.002	.
BARIUM (PPM)	.	.	.	.	.	.	.	.	.	.
BERYLLIUM (PPM)	.	.	.	.	.	.	.	.	.	.
CADMIUM (PPM)	.	.	.	.	.	.	.	.	.	.
CHROMIUM (PPM)	.	.	.	0.003	.	.	.	.	.	.
COPPER (PPM)	.	.	.	.	.	.	.	.	.	.
IRON, TOTAL (PPM)	0.172	0.339	0.202	0.553	1.06	0.643	0.197	.	0.417	.
LEAD (PPM)	.	.	.	.	-0.003	.	.	.	.	.
MERCURY (PPM)	-0.0002	-0.0002	-0.0002	-0.0002	-0.0002	-0.0002	-0.0002	.	-0.0002	.
NICKEL (PPM)	.	.	.	.	.	.	.	.	.	.
SELENIUM (PPM)	-0.002	-0.002	-0.002	-0.002	-0.002	-0.002	-0.002	.	-0.002	.
SILVER (PPM)	.	.	.	.	.	.	.	.	.	.
ZINC (PPM)	-0.005	-0.005	0.016	-0.005	0.006	-0.005	0.006	.	-0.005	.
GROSS ALPHA (PIC/L)	-2	-2	-2	-2	-2	-2	-2	.	-2	.

GROUNDWATER MONITORING REPORT/SECI UNITS 1 & 2

NOTE: (–) MEANS LESS THAN, (.) MEANS NO ANALYSIS REQUIRED THIS MONTH

MONTH: AUGUST, 1991

	WELL NUMBERS									
	10	11	12	13A	13B	14A	14C	15	16	17
CONSTITUENT										
CONDUCTIVITY (UMHOA/CM)	80	800	40	35	220	450	180	45	700	500
PH	4.7	7.5	4.7	4.8	4.1	4.2	7.6	5.2	5.4	4.7
CHLORIDE (PPM)	.	.	.	.	.	109	6	7	200	162
SULFATE (PPM)	.	.	.	.	.	48	2	3	73	31
ARSENIC (PPM)	.	.	.	.	.	–0.002	–0.002	–0.002	–0.002	–0.002
BARIUM (PPM)	.	.	.	.	.	.	.	.	.	.
BERYLLIUM (PPM)	.	.	.	.	.	.	.	.	.	.
CADMIUM (PPM)	.	.	.	.	.	.	.	.	.	.
CHROMIUM (PPM)	.	.	.	.	.	.	.	.	.	.
COPPER (PPM)	.	.	.	.	.	.	.	.	.	.
IRON, TOTAL (PPM)	.	.	.	.	.	0.463	–0.1	0.218	0.832	2.44
LEAD (PPM)	.	.	.	.	.	.	.	.	.	.
MERCURY (PPM)	.	.	.	.	.	–0.0002	–0.0002	–0.0002	–0.0002	–0.0002
NICKEL (PPM)	.	.	.	.	.	.	.	.	.	.
SELENIUM (PPM)	.	.	.	.	.	–0.002	–0.002	–0.002	–0.002	–0.002
SILVER (PPM)	.	.	.	.	.	.	.	.	.	.
ZINC (PPM)	.	.	.	.	.	–0.005	–0.005	0.006	–0.005	0.011
GROSS ALPHA (PIC/L)	.	.	.	.	.	–2	–2	–2	3+/–2	5+/–2

BEST AVAILABLE COPY

PSD-FL-078

AUG 09 1979

REPLY TO
ATTN OF: 4AR-AP

Mr. T. E. Crumlish
Project Director
Seminole Electric Cooperative, Inc.
Suite 108
7510 East Busch Boulevard
Tampa, Florida 33617

Dear Mr. Crumlish:

Review of your December 15, 1978 application to construct two 680 megawatt power boilers near Palatka, Florida has been completed. The construction is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD), contained in 40 CFR 52.21.

We have determined that the construction as described in the application meets all applicable requirements of the PSD regulations, subject to the conditions in the Final Determination (enclosed). This office performed a Preliminary Determination concerning the proposed construction, and published a request for public comment on February 20, 1979. A public hearing was held on June 4, 1979. Comments received were relayed to your offices. Your comments, and all of other written comments and those voiced at the public hearing, were addressed in the Final Determination. Authority to Construct a Stationary Source is hereby issued for the facility described above, subject to the conditions in the Final Determination. This authority to Construct is based solely on the requirements of 40 CFR 52.21, the federal regulation governing significant deterioration of air quality. It does not apply to NPDES or other permits issued by this agency or permits issued by other agencies. Information regarding EPA permitting requirements can be provided if you contact Mr. Joe Franzmathes, Director, Office of Program Integration and Operations, at 404/881-4727. Additionally, construction covered by this Authority to Construct must commence within 18 months from the receipt of this letter.

The United States Court of Appeals for the D. C. Circuit has issued a ruling in the case of Alabama Power Co. vs. Douglas M. Costle (78-1006 and consolidated cases) which has significant impact on the EPA prevention of significant deterioration (PSD) program and permits issued thereunder. Although the court has stayed its decision pending resolution of petitions for reconsideration, it is possible that the final decision will require modification of the PSD regulations and could affect permits issued under the existing program. Examples of potential impact areas include the scope of best available control technology (BACT), source applicability, the amount of increment available (baseline definition), and the extent of preconstruction monitoring that a source may be required to perform. The applicant is hereby advised that this permit may be subject to revocation as a result of the final court decision and its ultimate effect.

BEST AVAILABLE COPY

Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

Authority to Construct will take effect on the date of this letter. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Mr. Ray Cunningham, Chief, Air Strategy Development Section (404/881-3286).

Sincerely yours,

Thomas W. Devine, Director
Air & Hazardous Materials Division

Enclosure

cc: Dr. J.P. Subramani, Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation

RPfaff:tc:3286:7/11/79

4AH-AP	4AH-AP	4AH-AP	4AH
Pfaff	Cunningham	W.Smith	Devine

Yellow 10.9.5

REF: 4AH-AF

Mr. Robert E. Wales, Project Manager
Burns and Roe, Inc.
Burns and Roe Building
5520 Los Santos Way
Jacksonville, FL 32211

Dear Mr. Wales:

This letter is in response to your September 11, 1979 letter to Mr. Winston Smith.

Per Condition C of the final PSD determination for Seminole Plant Units 1 and 2, we have reviewed the draft contract for supply of the electrostatic precipitator (ESP) and find that the technical information provided therein is acceptable. No additional technical information or discussions with your representative (Dave Ross) is needed at this time regarding the design specifications for the ESP.

Please be aware that our review of and concurrence with the technical information provided in your September 11 letter does not relieve Seminole Electric Corporation, Incorporated from final compliance with the particulate emission limit specified in the final PSD permit for Seminole Plant Units 1 and 2.

If you have any comments or questions regarding this letter, please contact Mr. Frank Collins of my staff at 404/881-4552.

Sincerely yours,

Tommie A. Gibbs
Chief
Air Facilities Branch

cc: T. Crumlish, Seminole Electric

4AH-AF:Collins:gray:4552:10/31/79

4AH-AP
Collins

4AH-AF
Gibbs

United States
Environmental Protection
Agency

Region 4
345 Courtland Street NE
Atlanta GA 30308

Alabama, Georgia, Florida,
Mississippi, North Carolina,
South Carolina, Tennessee,
Kentucky

EPA

MAR 6 1979

REF:4AH-AP

RECD MAR 8 1979

Mr. T.E. Crumlish
Project Director
Seminole Electric Cooperative, Inc.
Suite 108
210 East Busch Boulevard
Tampa, Florida 33612

Dear Mr. Crumlish:

In response to your December 15, 1978 letter, the Air and Hazardous Materials Division of EPA's Region IV Office has reviewed your application for permission to construct. Enclosed are two copies of the preliminary determination.

As stated in the determination, it is our preliminary determination that construction of the proposed source can be approved if certain conditions are met. This approval would apply only to the requirements of EPA's "Regulations for the Prevention of Significant Deterioration of Air Quality." Other approvals, including State permits, must also be obtained prior to construction.

Also enclosed for your information is a copy of the public notice of the preliminary determination, to be published in the "Palatka Daily News" and the "Florida Star".

This information is being mailed to you for informational purposes. No action is required of you at this time unless you wish to comment on our findings to date. If you have any questions, please call Mr. Roger Pfaff at 404/881-2864.

Sincerely yours,

Winston A. Smith

Winston A. Smith, Chief
Air Programs Branch

Enclosures

cc: Dr. J. P. Subramani, Chief
Bureau of Air Quality Mgt.
DER-Tallahassee

U. S. Environmental Protection Agency

NOTICE

PRELIMINARY DETERMINATION CONCERNING THE PROPOSED CONSTRUCTION OF A POWER PLANT.

Seminole Electric Cooperative, Inc. has applied to the U.S. Environmental Protection Agency (EPA) to construct two 680 megawatt coal fired steam-electric units in Putnam County, Florida. The proposed construction is subject to EPA regulations for the Prevention of Significant Deterioration (PSD), 40 CFR 52.21. EPA has made a Preliminary Determination that the construction can be approved with conditions.

The maximum degree of Class II PSD increment consumption caused by the proposed construction is predicted to be as follows:

Particulate Matter, annual increment:	0
Particulate Matter, 24 hour increment:	5%
Sulfur Dioxide, annual increment:	25%
Sulfur Dioxide, 24 hour increment:	66%
Sulfur Dioxide, 3 hour increment:	85%

No Class I area will be affected.

Any person may submit written comments to EPA and/or request a public hearing. To be considered, any written comments must be received by EPA not later than 30 days from the date of this notice and submitted to:

Mr. Winston A. Smith, Chief
Air Programs Branch
U.S. Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30308

A request for a public hearing must be received not later than 15 days from the date of this notice, and sent to Mr. Smith.

A copy of all materials submitted by the applicant and a copy of the Preliminary Determination is available for inspection at the County Commissioners' Office in Palatka, Florida.

Review of a Proposed Air Pollution Source Pursuant to Environmental Protection Agency Rules for the Prevention of Significant Deterioration (PSD)
40 CFR 52.21

Seminole Electric Cooperative, Inc.

Seminole Plant Units No. 1 and No. 2
Putnam County, Florida

U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308

I Introduction

Seminole Electric Cooperative, Inc., has applied to the U.S. Environmental Protection Agency to construct a coal fired steam electric plant in Putnam County, Florida. The proposed construction is subject to review under 40 CFR 52.21, Regulations for the Prevention of Significant Deterioration (PSD). Under these regulations, a new source of air pollution in any one of 28 specified categories which will emit more than 100 tons per year of any pollutant, is subject to review for each of those pollutants. One of these categories is fossil fuel-fired steam electric plants of more than 250 million BTU per hour heat input, of which Seminole Plant is one.

Paragraph (r) of the PSD regulations requires, in part, that EPA issue a Preliminary Determination whether the source should be approved, approved with conditions, or disapproved. It is the decision of EPA that the source should be approved with conditions. The conditions are included to ensure that the applicant complies with emission control techniques and emission limits which are a part of the application. The conditions of approval follow on the next page.

CONDITIONS OF APPROVAL

A. FOR THE ELECTRIC UTILITY STEAM GENERATING UNITS

The applicant shall comply with emission limits and other requirements as specified by the U.S. Environmental Protection Agency's Standards of Performance for Electric Utility Steam Generating Units proposed on September 19, 1978 (40 CFR 60, Subpart Da). Emission limits for particulate matter, sulfur dioxide and nitrogen oxides are specified below:

Item 1 - Particulate Matter

(a) Particulate matter in gases discharged into the atmosphere from the steam generators shall not exceed 13 ng/J (0.03 lb/million Btu) heat input.

(b) Gases discharged into the atmosphere from the steam generators shall not exhibit greater than 20 percent opacity except for one 6 minute period per hour of not more than 27 percent opacity.

Item 2 - Sulfur Dioxide

(a) Sulfur dioxide in gases discharged into the atmosphere from the steam generators shall not exceed:

1. 340 ng/J heat input (0.80 lb/million Btu) derived from the combustion of fuel oil.

2. 520 ng/J heat input (1.2 lb/million Btu) derived from the combustion of coal except as provided under paragraph (b) of this section and;

3. 15 percent of the potential combustion concentration (85 percent reduction) except as provided under paragraphs (b) and (c) of this section.

(b) The sulfur dioxide emissions allowed under paragraph (a) of this section may be exceeded up to three 24-hour periods during any calendar month; however, the sulfur dioxide emissions must be reduced to less than 25 percent of the potential combustion concentration (75 percent reduction) at all times.

(c) The requirements under paragraph (a) of this section do not apply when the sulfur dioxide emitted to the atmosphere is less than 86 ng/J heat input (0.20 lb/million Btu).

(d) For purposes of determining compliance with provisions of paragraph (a)(3) of this section, any reduction in potential sulfur dioxide emissions resulting from the following may be credited in accordance with 40CFR60.48a(b):

(1) Fuel pretreatment.
(2) Coal pulverizers.
(3) Bottom ash and fly ash interaction.

(e) When different fuels are combusted simultaneously, the applicable standard is determined by proration using the following formula:

$PSso_2 = x(340)+y(520)/100$
where:

$PSso_2$ is the prorated standard for sulfur dioxide when combusting different fuels 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.

Item 3 - Nitrogen Oxide Emissions

(a) Nitrogen oxides in gases discharged into the atmosphere from the steam generators shall not exceed:

1. 130 ng/J heat input (0.3 lb/million Btu) derived from the combustion of fuel oil.

2. 260 ng/J heat input (0.6 lb/million Btu) derived from the combustion of bituminous coal.

(b) When both fuels are combusted simultaneously, the applicable standard is determined by proration using the following formula:

$PSno_x = x(130)+y(260)/100$
Where:
$PSno_x$ is the applicable standard for nitrogen oxides when multiple fuels are combusted simultaneously (ng/J heat input):

x is the percentage of total heat input derived from the combustion of fuel oils.
y is the percentage of total heat input derived from the combustion of bituminous coal.

B. FOR THE COAL PREPARATION AND MATERIALS HANDLING FACILITIES

For the coal preparation facilities, the applicant must meet requirements as specified by the U.S. Environmental Protection Agency's Standards of Performance for Coal Preparation Plants promulgated on January 15, 1976 (40 CFR 60, Subpart Y). Opacity requirements for these and other materials handling facilities are specified below.

Item 1

The applicant shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, coal transfer and loading system, or any other materials handling system, including lime and limestone processing and handling, gases which exhibit 20 percent opacity or greater.

C. SUBMISSION OF FINAL DESIGN SPECIFICATIONS TO EPA:

Item 1 - Control Devices

The applicant must submit to EPA, within ten working days after it becomes available, copies of all technical data pertaining to the selected control devices, including formal bid from the vendor, guaranteed efficiency or emission rate, and final detailed engineering specifications. A list of any additional required information will be sent to the applicant upon receipt of this submittal. Although the type of control devices which are described in the application have been determined by EPA in its initial pre-construction review to be adequate, EPA must review the final selected devices and EPA may, upon review of these data, disapprove the application if EPA determines the selected control devices to be inadequate to meet the emission limits specified in this conditional approval.

Item 2 - Coal Characteristics and Contracts

Before approval can be granted by EPA for the precipitator and scrubber under condition C.1. above, characteristics of the coal to be fired must be known. Therefore, before these approvals are granted, the applicant must submit to EPA copies of coal contracts which should include the expected sulfur content, ash content, and heat content of the coal to be fired. These data will be used by EPA in its evaluation of the adequacy of the control devices.

As an alternative to the submittal of contracts for purchase of coal, the applicant may submit the following information:

(a) The name of the coal supplier;

(b) The sulfur content, ash content, and heat content of the coal as specified in the purchase contract;

(c) The location of the coal deposits covered by the contract (including mine name and seam);

(d) The date by which the first delivery of coal will be made

(e) The duration of the contract; and

(f) An opinion of counsel for the applicant that the contract(s) are legally binding.

II BACKGROUND

On May 19, 1978, EPA received from Mr. T. E. Crumlish an application from Seminole Electric Cooperative, Inc. to construct two 680 megawatt coal fired steam electric generators in Putnam County, Florida. Additional information was submitted from Seminole or its representatives on June 8, July 3, October 26, November 28, November 29, and December 15, 1978. Also on December 15, Seminole submitted a revision to its application which changed the proposed emission rate of sulfur dioxide from the plant. This revision was submitted in order to make the proposed plant comply with proposed revisions to EPA's New Source Performance Standards published on September 19, 1978. Since the modification to the application increased the proposed SO_2 emission rate, EPA advised Seminole that this modification would change the date of complete application for review under the PSD regulation to December 15, 1978. Seminole objected to this determination in its letter of December 15, because this determination may have caused Seminole to be required to conduct ambient air quality monitoring in the vicinity of the proposed plant. EPA determined that, due to the existence of monitoring data already conducted in the area, and the minimal impact of the plant with regard to National Ambient Air Quality Standards, no additional monitoring would be required.

III REVIEW REQUIREMENTS

The pollutants for which potential emissions are greater than 100 tons per year, and therefore subject to review, are particulate matter, sulfur dioxide, nitrogen oxides, and carbon monoxide. Review of control technology and ambient impacts is required. For sources applying after August 7, 1978, ambient monitoring may be required.

Certain portions of the PSD review may not be required if the proposed modification is subject to EPA's interpretative ruling, or if the source is a nonprofit health or education institution, or if the source has previously received approval under PSD and is only relocating. None of these exemptions applies in this case.

Other exemptions can apply to control technology review and ambient impact review. For control technology review, if allowable emissions of any pollutant are less than 50 tons per year, 1000 pounds per day and 100 pounds per hour, or if a modification is made to an existing facility and the emissions are offset by reductions elsewhere, review may not be required. None of these exemptions applies in this case.

For ambient impact review and monitoring requirements, other exemptions are provided for. In addition to the allowable emission threshold, there are exemptions for temporary sources and for sources whose net emissions, after considering decreases, do not increase. None of these exemptions apply in this case.

A. Control Technology Review

The applicant is required to install best available control technology (BACT) for each pollutant, taking into account energy, environmental and economic impacts and other costs. EPA concludes that the systems proposed by the applicant represent BACT for particulate, SO_2 and nitrogen oxides. There is currently no applicable technology for reduction of carbon monoxide emissions beyond what is accomplished in the boiler.

1. Particulate

The applicant will install a high efficiency electrostatic precipitator (ESP) to control particulate emissions. Emission limits have been specified by EPA as a condition of approval. Bag filters are to be used to control particulate emissions from fly ash handling. Opacity limitations are imposed to ensure proper design and operation.

A combination of liquid spray and bag filter systems will be used to control particulate emissions from coal handling and lime and limestone handling. Opacity limitations are imposed to ensure proper design and operation.

2. Sulfur Dioxide

The applicant has proposed the use of coal washing and the installation of a limestone scrubber which will achieve an overall reduction of 85% of potential sulfur dioxide emissions. This will comply with proposed requirements under 40 CFR 60, Federal New Source Performance Standards. This requirement is considered BACT, and is included as a condition of approval.

3. Nitrogen Oxides

The applicant has proposed boiler design controls which limit flame temperature and oxygen availability in order to control the formation of nitrogen oxides in the boiler to 0.6 lb/mm Btu. EPA considers this system to represent BACT. An emission limitation of 0.6 lb/mm Btu is a condition of approval.

B. Impact Review

The PSD regulations require the following air quality impacts to be assessed by the applicant:
1) National Ambient Air Quality Standards (NAAQS)
2) PSD increments
3) Visibility, soils and vegetation
4) Impacts due to growth caused by proposed source

All these impacts were assessed by the applicant. Air quality modelling showed no violations of the NAAQS with all sources in the area of the Seminole Plant in operation. Likewise, the PSD increment analysis showed no violations with Units 1 and 2 operating at maximum load.

The percent consumption of the Class II PSD increments caused by the Seminole Plant are presented in the following table:

Increment	Pollutant	
	Particulate	SO2
Annual	0	25%
24 hour	5%	66%
3 hour	N/A	85%

Impacts on visibility, soils and vegetation and on air quality due to growth were judged to be minimal.

The closest Class I area is Okefenokee National Wilderness Area, about 105 km away. There will be no impact from the proposed plant on this area.

The closest area where NAAQS is now being violated is the City of Jacksonville, about 50 km away. The impact of particulate emissions from Seminole on this area will be below the levels EPA considers significant.

NPDES
JMS

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In Re:	)
	)
Seminole Electric Cooperative, Inc.	)
Seminole Power Plant Units 1 &2	)
Power Plant Certification	)
Modification Request	)
No. PA 78-10	)
Putnam County, Florida	)
	)

FINAL ORDER
MODIFYING CONDITIONS OF CERTIFICATION

The Department of Environmental Regulation after notice and opportunity for hearing modifies the Conditions of Certification for the Seminole Electric Cooperative, Seminole Power Plant pursuant to the Florida Electrical Power Plant Siting Act Section 403.516(1), Florida Statutes, and Condition XXV, Modification of Conditions, which delegates authority to modify conditions to the Department.

On May 15, 1992, Seminole Electric Cooperative, Inc. submitted a petition to the Department requesting certain modifications of the Conditions of Certification for the above referenced facility.

On June 19, 1992, Notice of Proposed Modification of Power Plant Certification was served on all parties, and a Notice of Proposed Modification of Power Plant Certification was published in the Florida Administrative Weekly. No hearing was requested, therefore the Department adopts the proposed agency action as final.

Accordingly, the Department pursuant to Section 403.516(1), Florida Statutes (Supp 1990), modifies the Conditions of Certification as follows:

Condition II.A.3. Thermal Mixing Zone

The instantaneous zone of thermal mixing for cooling tower blowdown shall not exceed an area of ~~1,235 square feet~~, 1705 square feet at a daily average discharge temperature of 95° F. During discharge, the blowdown from the cooling towers for Units No. 1 & 2 shall be withdrawn at the point of lowest temperature of the

recirculating cooling water prior to the addition of makeup water. The temperature at the point of discharge to the St. Johns River shall not be greater than 98 degrees F, nor shall it exceed 95° F on a daily average. The temperature of the water at the edge of the mixing zone shall not exceed the limitations of paragraph ~~17-3.05(1)(d)~~ 17-302.520(4)(a), F.A.C. except on occasions in which the temperature of the unaffected receiving waters exceeds 92 degrees F.

Any party to the this Order has a right to seek judicial review of this Order pursuant to Section 120.67, Florid Statutes by the Filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, 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 of Appeal must be filed within 30 days from the date this Order is filed with the clerk of the Department.

DONE AND ORDERED this 14th day of October 1992 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for

Carol M. Browner
Secretary

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Mary L. Wilson 10-14-92
Clerk Date

Certificate of Service

I hereby certify that a copy of the Petition for Modification of the Seminole Electric Cooperative, Seminole Power Plant Site Certification was sent to the following parties by United States mail on October 16th, 1992.

Kathryn L. Menella, Esquire
St. Johns River Water Management District
Post Office Box 1429
Palatka, Florida 32178-1429

Steve Pfeiffer, General Counsel
Department of Community Affairs
2740 Center View Drive
Tallahassee, FL 32399-2100

Michael Palecki, Esquire
Florida Public Service Commission
Fletcher Building
101 East Gaines Street
Tallahassee, FL 32399-0863

James S. Alves, Esquire
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314

Mike Opalinski
Manager Environmental Affairs
Seminole Electric Cooperative, Inc.
Post Office Box 272000
Tampa, Florida 33688-2000

Richard T. Donelan
Assistant General Counsel

State of Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730