

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Jeff Koerner, Air Permitting North Section
DATE: September 9, 2008
SUBJECT: Project No. 1070025-010-AC
Seminole Generating Station, Units 1 and 2
Permanent Approval of Wet Coal Additive, RAMSORB 200
Exemption from the Requirement to Obtain Air Construction Permit

Seminole Electric Cooperative, Inc. operates the Seminole Generating Station, which is an existing power plant (SIC No. 4911) located in Putnam County, Florida. During wet weather, the plant is occasionally forced to reduce the coal firing rate because of problems with maintaining the flow of coal. With the Department's prior authorization, the plant conducted a trial of RAMSORB 200, which was added at a rate of approximately 4 pounds per ton of wet coal. The additive consists of sodium polyacrylate, which is a non-hazardous material that absorbs water from the wet coal to keep it from clumping. The plant noticed some decrease in plugged chutes and pipes that feed coal into the ball mills, which lead to a more stable operation.

For the trial, the coal additive was delivered in a tote. A small blower was used to feed the additive into small ports installed in the coal inspection chute. For the permanent authorization, little new construction or equipment will be needed since the additive will only be used during heavy downpours that affect the coal. Future injection rates will likely be at 4-5 lb/ton of coal, which represents only 0.25% of the material input. For the identified conditions, existing CEMS collected CO, NO_x and SO₂ emissions data as summarized by the following table.

Conditions		Range	Heat Input Rate	CO	NO _x	SO ₂
			MMBtu/hour	ppm	lb/MMBtu	lb/MMBtu
8/21/2008	Rain: 2.03"	Min.	5682.7	97.150	0.355	0.356
	No RAMSORB	Max.	6299.3	169.090	0.416	0.472
		Avg.	6161.5	107.637	0.394	0.387
8/22/2008	Rain: 4.69"	Min.	5365.3	93.690	0.345	0.298
	RAMSORB added	Max.	6440.3	407.960	0.405	0.460
		Avg.	6090.4	152.281	0.376	0.392
8/23/2008	Rain: 1.68"	Min.	5414.2	113.570	0.323	0.286
	RAMSORB added	Max.	6431.2	446.750	0.429	0.437
		Avg.	5992.5	278.151	0.380	0.376
8/24/2008	Rain: 1.85"	Min.	5278.8	86.490	0.286	0.245
	No RAMSORB	Max.	6563.1	354.340	0.448	0.481
		Avg.	6049.5	147.507	0.388	0.359

As shown above, NO_x and SO₂ emissions were comparable under each set of conditions. The emissions of these pollutants are generally a function of the actual fuel sulfur content as well as the heat input rate. CO emissions showed a wider range; however, higher emissions appeared to be a function of wetter conditions and higher fuel firing rates, which would be the case whether or not RAMSORB was used.

There does not appear to be any significant difference with the use of RAMSORB as a fuel additive to improve handling. RAMSORB will only be used two or three times during the year for extended downpours. Based on the trial results, I recommend exempting this activity from the requirement to obtain an air permit.

Attachments



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 9, 2008

Sent by Electronic Mail, Received Receipt Requested

Mr. Mike Roddy, Manager of Environmental Affairs
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway, P.O. Box 272000
Tampa, Florida 33688-2000

Re: Project No. 1070025-010-AC
Seminole Generating Station, Units 1 and 2
Approval of Permanent Use of RAMSORB 200 as a Wet Coal Additive
Exemption from Requirement to Obtain Air Construction Permit

Dear Mr. Roddy:

On September 8, 2008, we received your request for permanent authorization to use RAMSORB 200 as a wet coal additive on the existing coal-fired units at the Seminole Generating Station, which is located in Putnam County at 890 North U.S. Highway 17, north of Palatka. The additive consists of sodium polyacrylate, which is a non-hazardous material that absorbs water from the wet coal to keep it from clumping. During wet weather, the plant is occasionally forced to reduce the coal firing rate because of problems with maintaining the flow of coal. In a recent trial during wet weather conditions, 4 lb of RAMSORB 200 was applied per ton of coal. The plant noticed some decrease in plugged chutes and pipes that feed coal into the ball mills, which lead to a more stable operation. Data collected for carbon monoxide, nitrogen oxides and sulfur dioxide from continuous emissions monitors showed negligible emissions changes as a result of the fuel additive.

Determination: Based on the results of the trial, the Department approves your request to use RAMSORB 200 as a wet coal additive to improve handling, which includes minor construction activities and equipment to transfer, store and handle the wet coal additive. Pursuant to Rule 62.4.040(1)(b), F.A.C., the Bureau of Air Regulation determines that the activity will not emit air pollutants, "... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified." Therefore, the project is exempt from the requirement to obtain an air construction permit. This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

NOTICE OF EXEMPTION FROM AIR CONSTRUCTION PERMITTING

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the agency clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions must be filed within 21 days of receipt of this written notice of exemption from air permitting requirements. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

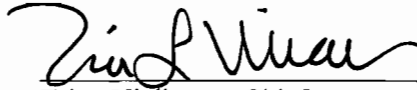
Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

NOTICE OF EXEMPTION FROM AIR CONSTRUCTION PERMITTING

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Exemption from Air Construction Permitting was sent by electronic mail with received receipt requested to the persons listed below.

Mr. James S. Frauen, Seminole Electric Cooperative, Inc. (JFrauen@seminole-electric.com)

Mr. Mike Roddy, Seminole Electric Cooperative, Inc. (WMRoddy@seminole-electric.com)

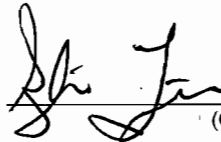
Mr. Chris Kirts, NED Office (Christopher.Kirts@dep.state.fl.us)

Mr. Mike Halpin, DEP Siting Office (Mike.Halpin@dep.state.fl.us)

Ms. Kathleen Forney (forney.kathleen@epa.gov)

Clerk Stamp

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



(Clerk)

9/9/08
(Date)

Livingston, Sylvia

From: Mike Roddy [WMRoddy@seminole-electric.com]
Sent: Tuesday, September 09, 2008 11:56 AM
To: Livingston, Sylvia
Subject: Re: Seminole Electric Cooperative, Inc., Seminole Generating Station/Project No. 1070025-010-AC - Exemption from Requirement to Obtain Air Construction Permit

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 9/9/2008 11:19 AM >>>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,
DEP, Bureau of Air Regulation

<<1070025-010-AC.pdf>>

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

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9/23/2008

Livingston, Sylvia

From: Jim Frauen [JFrauen@seminole-electric.com]
Sent: Tuesday, September 09, 2008 1:14 PM
To: Livingston, Sylvia
Subject: Re: Seminole Electric Cooperative, Inc., Seminole Generating Station/Project No. 1070025-010-AC - Exemption from Requirement to Obtain Air Construction Permit

Ms Livingston:

I received the attached documents.

Thank you for your assistance.

Jim Frauen

Jim Frauen
Director of Project Engineering
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, FL 33618
(813) 739-1213 Direct Line
(813) 690-3641 Cell
(813) 264-7906 Fax
jfrauen@seminole-electric.com

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 9/9/2008 11:19 AM >>>

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Thank you,
DEP, Bureau of Air Regulation

<<1070025-010-AC.pdf>>

9/23/2008

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, September 09, 2008 11:19 AM
To: 'JFrauen@seminole-electric.com'; 'WMRoddy@seminole-electric.com'
Cc: Kirts, Christopher; Halpin, Mike; 'forney.kathleen@epa.gov'; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Seminole Electric Cooperative, Inc., Seminole Generating Station/Project No. 1070025-010-AC - Exemption from Requirement to Obtain Air Construction Permit
Attachments: 1070025-010-AC.pdf

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Thank you,

DEP, Bureau of Air Regulation



1070025-010-AC.pdf (1 MB)

Tracking:	Recipient	Delivery	Read
	✓ JFrauen@seminole-electric.com'		
	✓ WMRoddy@seminole-electric.com'		
	✓ Kirts, Christopher	Delivered: 9/9/2008 11:19 AM	
	✓ Halpin, Mike	Delivered: 9/9/2008 11:19 AM	Read: 9/9/2008 12:14 PM
	✓ forney.kathleen@epa.gov'		
	✓ Koerner, Jeff	Delivered: 9/9/2008 11:19 AM	
	✓ Walker, Elizabeth (AIR)	Delivered: 9/9/2008 11:19 AM	

Livingston, Sylvia

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Tuesday, September 09, 2008 11:20 AM
To: Livingston, Sylvia
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(485 B)



Message
Headers.txt (2 KB)

This is the mail system at host mseive01.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<forney.kathleen@epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK,
sent 48C6942B_6066_1831_3 B54D1443CC

Message Headers (2).txt

Received: from tlhexsprot2.floridadep.net (tlhexsprot2.floridadep.net [199.73.152.8])
by mseive01.rtp.epa.gov (Postfix) with ESMTP id 70199443AE
for <forney.kathleen@epa.gov>; Tue, 9 Sep 2008 11:19:12 -0400 (EDT)

Content-Transfer-Encoding: 7bit

Importance: normal

Priority: normal

Received: from tlhexsmb4.floridadep.net ([172.20.30.47]) by tlhexsprot2.floridadep.net with Microsoft
SMTPSVC(5.0.2195.6713); Tue, 9 Sep 2008 11:19:06 -0400

X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2800.1896

Content-Class: urn:content-classes:message

Return-Receipt-To: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>

MIME-Version: 1.0

Content-Type: multipart/mixed;

boundary="----_NextPart_001_01C9128F.64377A1E"

Disposition-Notification-To: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>

Subject: Seminole Electric Cooperative, Inc., Seminole Generating Station/Project No. 1070025-010-AC -
Exemption from Requirement to Obtain Air Construction Permit

Date: Tue, 9 Sep 2008 11:19:02 -0400

Message-ID: <864D0E673032DD47ABE8B4EE542DF7CAC71D62@tlhexsmb4.floridadep.net>

X-MS-Has-Attach:

X-MS-TNEF-Correlator:

Thread-Topic: Seminole Electric Cooperative, Inc., Seminole Generating Station/Project No. 1070025-010-AC -
Exemption from Requirement to Obtain Air Construction Permit

thread-index: AckSj2N5Lp5LvSabSq3/r2VTdR71A==

From: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>

To: <JFrauen@seminole-electric.com>,

<WMRoddy@seminole-electric.com>

Cc: "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>,

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

<forney.kathleen@epa.gov>,

"Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>,

"Walker, Elizabeth \\\(AIR\\)" <Elizabeth.Walker@dep.state.fl.us>

X-OriginalArrivalTime: 09 Sep 2008 15:19:06.0077 (UTC) FILETIME=[662F50D0:01C9128F]