



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

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January 14, 2015

*Sent by Electronic Mail – Received Receipt Requested*

[jramirez@seminole-electric.com](mailto:jramirez@seminole-electric.com)

Juan Ramirez, Senior Environmental Engineer  
Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
P.O. Box 272000  
Tampa Florida 33688-2000

Re: Seminole Generating Station (SGS) Units 1 and 2  
MATS Compliance Extension Request  
Project Number: 1070025-024-AV  
Request for Additional Information

Dear Mr. Ramirez:

On December 17, 2014 we received your request<sup>1</sup> for a one-year extension of the Mercury and Air Toxics Standards (MATS) compliance deadline for the coal-fueled Units 1 and 2 at the Seminole Generating Station (SGS) until April 16, 2016<sup>2</sup>. Additional information is required to consider your request. Please provide the information requested below (as well as any other information you wish to provide) within 30 calendar days of this notification.

1. **Pollution Control Projects and Startup/Shutdown Requirements:** Seminole Electric requests a compliance date extension for all requirements under the MATS rule for SGS coal fired Units 1 and 2 to include all pending deadlines and obligations imposed by or through the application of the MATS rule, including, for example, the compliance date and any dates calculated from that date, as well as any obligations under the General Provisions of 40 CFR Part 63 (Subpart A – General Provisions).

The Department notes that MATS extensions are issued for the installation of pollution controls, which can include fuel switching and transmission line upgrades to ensure grid stability. While Seminole Electric indicated in its extension request that that pollution control project(s) may be required to meet the MATS requirements, no details of the project(s) were given. Please provide a detailed description of the pollution control(s) including timelines and a work schedule for the timely installation of such controls.

Seminole also indicated difficulties accommodating the new startup and shutdown procedures and the associated additional monitoring requirements. The Department notes that that this recent change presents a new available option; Seminole Electric can continue to utilize the previous startup and shutdown procedures included in MATS as an interim measure while conducting the work necessary to utilize the new procedures. The Department does not believe the new procedures represent a valid

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<sup>1</sup> [SGS Extension Request](#) dated 12/17/14.

<sup>2</sup> 40 Code of Federal Regulations, Part 63, [Subpart UUUUU](#) - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units.

Mr. Juan Ramirez  
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reason for a MATS extension. If Seminole Electric has addition reasons justifying this request please provide them to the Department.

2. Extensions for Specific MATS Requirements: As previously noted, Seminole Electric has requested a compliance extension for all requirements under the MATS rule for SGS coal fired Units 1 and 2. The Department believes this request is too broad in scope. Please indicate the specific sections and conditions in the MATS rule to which your extension request applies.
3. Title V Permit Revision Application: In accordance with 40 CFR 63.6(i)(4)(i)(A), please submit the necessary forms (first seven should suffice) to constitute an application for a Title V permit revision. A link to the application forms is given below:  
<http://www.dep.state.fl.us/air/rules/forms/application.htm>

If you have any questions regarding this request, please contact David Read at 850-717-9075 or me at 850-717-9083.

Sincerely,

Jeffery F. Koerner, Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

cc: Mike Roddy, SGS Director of Environmental Affairs ([wmroddy@seminole-electric.com](mailto:wmroddy@seminole-electric.com))