



February 13, 2015

Mr. Jeffrey F. Koerner, Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Seminole Electric Cooperative Response to RAI  
Seminole Generating Station (SGS) Units 1 and 2  
MATS Compliance Extension Request  
Project Number: 1070025-024-AV

Dear Mr. Koerner:

Seminole is in receipt of the Department's Request for Additional Information (RAI), dated January 14, 2015, for the above-related MATS Extension Request. Seminole continues to evaluate the efforts and potential projects it may need to undertake to comply with EPA's Mercury and Air Toxics Standard (MATS), and specifically the requirements during startup and shutdown that EPA recently finalized on November 19, 2014. On November 30, 2012, several months after EPA published the final rule, EPA agreed to reconsider several requirements related to startup and shutdown periods that are of concern for Seminole, including defining when startup ends, and the work practice standards related to engaging pollution control devices and the use of "clean fuels." Seminole submitted its MATS Extension request on December 17, 2014, based on concerns that it may not be able to comply with these newly-revised provisions. Also, on December 19, 2014, EPA proposed a technical corrections memo (161 pages) on the MATS that would resolve conflicts between preamble and regulatory text and clarify some of the language in the regulatory text. Seminole continues to review the impact of this latest clarification in the MATS Rule and specifically the definition of startup.

The December 17<sup>th</sup> provisions require the use of clean fuels on startup, and operation of PM control devices as soon as coal is fired, or alternatively, within 1 hour after coal is fired if the source elects to rely on the alternative definition of startup (which defines the end of startup as 4 hours after electricity is sent to the grid or used on site). Seminole uses no. 2 oil for startup, which meets EPA's

definition of clean fuel. For safety and maintenance reasons, and as described in its Precipitator Startup Procedure attached to its Title V permit, Seminole has historically required a minimum temperature and maximum oxygen level before engaging its electrostatic precipitator (ESP); these temperature and O<sub>2</sub>-level parameters cannot safely be achieved on oil. EPA readily acknowledges these safety and operational concerns (79 Fed. Reg. 68779), and responds by stating that certain sources “will have to take some actions at their facility to comply with the work practice.”<sup>1</sup> Accordingly, Seminole continues to evaluate whether there are projects that it can undertake to safely engage its ESP as soon as coal is fired (or within 1 hour), as well as projects for compliance with MATS during normal operations and how long such projects may take to perform. If Seminole identifies viable projects that will take beyond April 16, 2015, it will need a MATS extension for this purpose, and can file the appropriate Title V permitting forms at that time. If Seminole determines that it cannot safely engage its ESP as soon as coal is fired (or within 1 hour), then it will need to request an alternative work practice standard pursuant to 40 CFR 63.10011(g)(4). Seminole will keep the Department apprised of the status of its evaluation, and expects to have its analysis complete, and path forward determined, by March 13, 2015.

Seminole appreciates the Department’s consideration of this information and request. If you have any questions or wish to discuss this matter further, please contact me at (813) 739-1219.

Sincerely,

A handwritten signature in black ink, appearing to read "Juan Ramirez", with a stylized flourish at the end.

Juan Ramirez  
Senior Environmental Engineer

Cc: Mr. David Read

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<sup>1</sup> EPA-HQ-OAR-2009-0234, EPA Summary of Response to Public Comments and Responses (Nov. 2014), page 42.