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DIVISION OF AIR
RESOURCE MANAGEMENT

March 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 Electric Cooperative, Inc., (Seminole) responded to the Department's RAI on February 13, 2015, and stated it would update the Department regarding the status of its evaluation and path forward by March 13, 2015. Seminole has determined that changes to its ESP startup procedure *may* allow it to engage the ESP once the unit converts to firing coal (or within 1 hour). However, Seminole needs operational experience with this new procedure before it can be assured that it can safely and effectively engage its ESP, without causing undue or excessive degradation of its system/equipment.

Accordingly, Seminole reiterates its request for a one-year extension of the MATS compliance deadline, limited to the requirement to engage its ESP during startup once the unit converts to firing coal. SGS Unit 1 is currently in an outage, and Seminole anticipates starting up Unit 1 in mid-April 2015. We will submit a report to the Department within 30 days of returning the unit to service describing when SGS was able to engage the Unit 1 ESP and any issues encountered. We will follow the same process in November 2015 when we take Unit 2 down for its fall outage. We believe this time period is warranted to make certain we can fully comply with the new rule provisions.

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

Sincerely,

Juan Ramirez
Senior Environmental Engineer

cc: Mr. David Read