



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

July 13, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Scott Salisbury
Seminole Energy, L.L.C.
29261 Wall Street
Wixom, Michigan 48393

Re: DEP File No. 1170084-005-AC (PSD-FL-376)
Seminole Energy – Installation of six (6) reciprocating internal combustion engines

Dear Mr. Salisbury:

Enclosed are comments submitted by the Environmental Protection Agency (EPA), Region 4, in regards to the completeness issues for this project. Please submit the information as requested by EPA to the Department's Bureau of Air Regulation. We are still awaiting comments from U.S. Fish and Wildlife Service, which will be forwarded to you if we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If you have any questions regarding this matter, please call Mr. Syed Arif, P.E. at 850/921-9528 or Mr. James Purvis of EPA at 404/562-9139.

Sincerely,

Syed Arif, P.E.
Bureau of Air Regulation

/sa

Enclosure

cc: G. Worley, EPA Region 4
J. Bunyak, NPS
L. Kozlov, DEP-CD
J. Pope, P.E., Clayton Group Services, Inc.

"More Protection, Less Process"

Printed on recycled paper.

Arif, Syed

From: Purvis.James@epamail.epa.gov
Sent: Wednesday, July 12, 2006 12:08 PM
To: Arif, Syed
Cc: Little.James@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Worley.Gregg@epamail.epa.gov
Subject: Seminole Electric LFG project

- Can the source owner provide data supporting the claim that the source can not meet a lower particulate emission rate such as the one taken and operated successfully at Bio Energy Texas utilizing the same ICs?

- The source owner has used AP-42 emission factors to estimate PTE of HCl from the project and found that potential to be 10.9 TPY HCl. However, the source owner states its parent company, Landfill Energy Systems has historical or test data available that shows the use of AP-42 factors largely overestimates actual expected emissions. Does the source owner have available supporting data that could correlate emissions from these mentioned facilities and the site for the proposed project? Please explain the approach taken. If use of AP-42 factors is preferred by the source, an operating restriction to limit emissions to 10 TPY HCl is necessary to ensure enforceability of this condition.

- The source has used AP-42 emission factors to estimate sulfur content of LFG onsite but references findings from parent company sulfur content analysis being available. Can the source owner perform sulfur analysis of LFG onsite? Can the source owner explain how it anticipates showing compliance?

James D Purvis
Environmental Engineer
EPA Region IV
Air, Pesticides & Toxics Management Division - Air Permitting Section

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>x <i>Diane Lehr</i></p>
<p>1. Article Addressed to:</p> <p>Mr. Scott Salisbury Seminole Energy, L.L.C. 29261 Wall Street Wixom, Michigan 48393</p>	<p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>Diane Lehr</i> <i>7-20-06</i></p>
<p>2. Article Number (Transfer from service label)</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
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City, State, ZIP+4 Wixom, Michigan 48393	
PS Form 3800, June 2002	See Reverse for Instructions