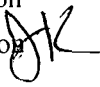


Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Jeff Koerner, Air Permitting North Section 
DATE: October 15, 2007
SUBJECT: Project No. 1070025-006-AC
Seminole Generating Station
Trial of Wet Coal Additive, RAMSORB 200
Exemption from 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. The plant proposes a trial of RAMSORB 200, which is added at a rate of approximately 5 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.

For the trial, the vendor will provide a blower unit to feed the additive into a three-inch hole in the coal inspection chute. The trial will be conducted during wet weather (downpour of rain) on one unit and is expected to last for one day. Approximately 10 metric tons of the additive will be used. Based on the material proposed and the charging rate, it is not expected to result in any changes in emissions.

To authorize the trial, I recommend a case-by-case exemption from the requirement to obtain an air construction permit pursuant to Rule 62-4.040, F.A.C. The attached exemption includes a requirement to report CO, NO_x and SO₂ emissions based on data collected by the continuous emissions monitoring systems. Emissions collected during the trial will be compared to baseline emissions for the unit to determine any emissions impacts from the wet coal additive. If the trial is successful and shows negligible changes in emissions, the plant will likely add this capability as an "insignificant activity".

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

October 15, 2007

Sent by Electronic Mail, Received Receipt Requested

Mr. James S. Frauen, Manager of Environmental Affairs
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, Florida 33618

Re: Project No. 1070025-006-AC
Seminole Generating Station
Trial of Wet Coal Additive, RAMSORB 200
Exemption from Requirement to Obtain Air Construction Permit

Dear Mr. Frauen:

On October 10th, we received a request on behalf of Seminole Electric Cooperative, Inc. for authorization to try a wet coal additive on one of the existing units at the Seminole Generating Station, which is located in Putnam County at 890 North U.S. Highway 17, north of Palatka. During wet weather, the plant is occasionally forced to reduce the coal firing rate because of problems with maintaining the flow of coal. The plant proposes a trial of RAMSORB 200, which is added at a rate of approximately 5 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.

For the trial, the vendor will provide a blower unit to feed the additive into a three-inch hole in the coal inspection chute. The trial will be conducted during wet weather (downpour of rain) on one unit and is expected to last for one day. Approximately 10 metric tons of the additive will be used. Based on the material proposed and the charging rate, it is not expected to result in any changes in emissions.

Determination: The Department approves your request as conditioned by the provisions attached to this letter. Pursuant to Rule 62.4.040(1)(b), F.A.C., the Department exempts this temporary project 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 Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. 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.

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

CASE-BY-CASE EXEMPTION

must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 21 days of receipt of this Written Notice of Exemption. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 21 days of publication of a Public Notice or within 21 days of receipt of this Written Notice of Exemption, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 21 days of receipt of that notice, regardless of the date of publication. 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; (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 of Exemption. 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.

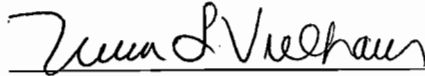
Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition 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 Department.

Appeal: 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

CASE-BY-CASE EXEMPTION

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.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk

enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by electronic mail with received receipt requested before the close of business on 10/16/07 to the persons listed:

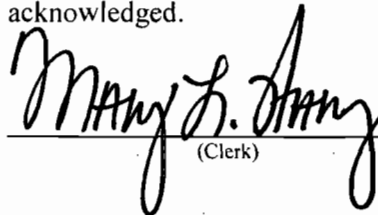
Mr. James S. Frauen, Seminole Electric Cooperative, Inc. (JFrauen@seminole-electric.com)

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

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

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

10/16/07
(Date)

CASE-BY-CASE EXEMPTION

Subject to the following conditions, Seminole Electric Cooperative, Inc. is authorized to conduct the following temporary trial.

1. Seminole Electric Cooperative, Inc. is authorized to add RAMSORB 200 to wet coal fired in one of the units. The trial is expected to occur on one wet weather day (downpour of rain). The injection rate will be approximately 5 pounds per ton of wet coal fired and approximately 10 metric tons for the trial. The additive injection rate shall be monitored and recorded during the trial.
2. During the trial, the existing continuous emissions monitoring systems shall be operating and properly functioning. The plant shall collect emissions data for carbon monoxide, nitrogen oxides and sulfur dioxide while injecting the wet coal additive.
3. During the trial, the plant shall comply with all conditions of the current Title V air operation permit.
4. Within 45 days of completing the trial, Seminole Electric Cooperative, Inc. shall submit a report to the Bureau of Air Regulation summarizing the following information: a description of the weather conditions during the trial; the additive injection rate; the coal firing rate; the heat input rate; a comparison of the carbon monoxide, nitrogen oxides and sulfur dioxide emissions rates (lb/MMBtu and lb/hour) during the trial with the baseline case; and a conclusion by the plant on the effectiveness of the wet coal additive. Copies of the report shall also be sent to the Department of Environmental Protection's Northeast District Office.
5. This authorization expires on May 1, 2008.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Wednesday, October 17, 2007 2:23 PM
Subject: Read: Letter - Mr. James S. Frauen - Seminole Electric Cooperative, Inc. - Project # 1070025-006-AC

Your message

To: 'Mr. James S. Frauen, Seminole Electric Cooperative, Inc.'; 'Mr. Mike Roddy, Seminole Electric Cooperative, Inc.'; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. James S. Frauen - Seminole Electric Cooperative, Inc. - Project #1070025-006-AC
Sent: 10/16/2007 2:44 PM

was read on 10/17/2007 2:23 PM.

Harvey, Mary

From: Harvey, Mary
Sent: Tuesday, October 16, 2007 2:44 PM
To: 'Mr. James S. Frauen, Seminole Electric Cooperative, Inc.'; 'Mr. Mike Roddy, Seminole Electric Cooperative, Inc.'; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. James S. Frauen - Seminole Electric Cooperative, Inc. - Project #1070025-006-AC
Attachments: Seminole Exemption Letter - 1070025.pdf

Tracking:	Recipient	Read
	'Mr. James S. Frauen, Seminole Electric Cooperative, Inc.'	
	'Mr. Mike Roddy, Seminole Electric Cooperative, Inc.'	
	Kirts, Christopher	
	Koerner, Jeff	
	Adams, Patty	Read: 10/16/2007 4:48 PM
	Gibson, Victoria	Read: 10/17/2007 2:23 PM

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

Harvey, Mary

From: Mike Roddy [WMRoddy@seminole-electric.com]
Sent: Tuesday, October 16, 2007 2:57 PM
To: Harvey, Mary
Subject: Re: Letter - Mr. James S. Frauen - Seminole Electric Cooperative, Inc. - Project #1070025-006-AC

Mary: For future reference, James Frauen is no longer the mgr of Environmental Affairs-I am. Mike Roddy

>>> "Harvey, Mary" <Mary.Harvey@dep.state.fl.us> 10/16/2007 2:44 PM >>>

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

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.

10/18/2007

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Tuesday, October 16, 2007 4:48 PM
Subject: Read: Letter - Mr. James S. Frauen - Seminole Electric Cooperative, Inc. - Project # 1070025-006-AC

Your message

To: 'Mr. James S. Frauen, Seminole Electric Cooperative, Inc.'; 'Mr. Mike Roddy, Seminole Electric Cooperative, Inc.'; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. James S. Frauen - Seminole Electric Cooperative, Inc. - Project #1070025-006-AC
Sent: 10/16/2007 2:44 PM

was read on 10/16/2007 4:48 PM.