

From: [Justin Gostnell](#)
To: [SCQ](#)
Subject: PA 78-10 Amendment One-time Consumptive Use Increase 2023
Date: Wednesday, November 15, 2023 9:40:49 AM
Attachments: [2023 1114 - Request for CY23 Consumptive Use Increase.pdf](#)

EXTERNAL MESSAGE

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Ms. Mulkey, see attached amendment for the department's review.

Sincerely,

Justin Gostnell

Senior Environmental Regulatory Specialist
Seminole Electric Cooperative, Inc.
813-244-4877



November 14, 2023

Ms. Cindy Mulkey
Florida Department of Environmental Protection (FDEP)
Siting Office
2600 Blair Stone Road
Tallahassee, Florida 32399-3000

Re: Seminole Electric Cooperative, Inc.
Seminole Generating Station, Putnam County Florida
Power Plant Certification No. PA 78-10
Post-Certification Amendment

Dear Ms. Mulkey:

Pursuant to Section 403.5113(1)(a), Florida Statutes and Rule 62-17.205, Florida Administrative Code, please accept this letter and attachments as a post-certification amendment to the Seminole Electric Cooperative, Inc. ("Seminole") Site Certification Application ("Application") for the Seminole Generating Station in Putnam County, Florida. This post-certification amendment addresses a request for a one-time increase to the groundwater consumptive use authorization.

In late 2017, Seminole submitted a Site Certification Application for the construction of a 2 x 1 natural gas fired generating facility (designated the Seminole Combined Cycle Facility (SCCF)) to be built within the SGS certified property. In accordance with the terms of a Consent Order (CO) executed with FDEP (OGC File 23-0087) in early 2023, and in relation to a *force majeure* event delaying commercial operation of SCCF, Seminole has operated its SGS Unit 1 for periods beyond those anticipated during the submission of the 2017 SCCF SCA. Such operations have included both on-grid generation and off-grid periods of "rapid standby" that require makeup water usage notwithstanding the absence of fuel being fired. Pursuant to the CO, Seminole will permanently remove Unit 1 from service by early January 2024.¹ At such time, the combined SGS Unit 2/SCCF operations are expected to be representative of the conditions utilized to calculate the requested groundwater allocation detailed within the 2017 SCCF SCA.

Per Section B, Condition III.A.13 of the SGS Conditions of Certification (PA78-10), Seminole is authorized a total withdrawal of water "from the Upper Floridan aquifer (UFA) for power plant process, cooling, potable, service, irrigation, and well testing water" of 226.3 million gallons (0.62 million gallons per day (mgd) annual average). At this time, Seminole has not exceeded the allotment, however, based on projected water needs for the remaining year, Seminole is estimating total groundwater use for the year could reach 256 million gallons, an increase of approximately 30 million gallons over the authorized allocation.

Based on these estimates, Seminole is requesting a one-time increase of the withdrawal allocation from the Upper Floridan aquifer (UFA) from 226.3 million gallons to 256 million gallons. This increase will allow Seminole to provide needed operational flexibility until Unit 1 is removed from service.

If the Department concurs, Seminole requests that the Department approve the requested amendment and provide written notification of the same to Seminole, all reviewing agencies, and all parties to the original certification. If you or any of the parties have any questions or concerns, or require additional information, please contact me at (813) 963-0994, ext. 1224 or Justin Gostnell at (813) 963-0994, ext. 1375 or by email at jgostnell@seminole-electric.com.

Sincerely,

Lewis Snyder,
Director of Regulatory Compliance

Cc: Justin Gostnell, Seminole

¹ Of note, fuel-firing has been limited to only one coal-fired unit (Unit 1 or Unit 2) at any given time, subsequent to achievement of SCCF commercial operation.