

Hopping Green & Sams

Attorneys and Counselors

November 7, 2008

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

NOV 07 2008

Via Hand Delivery

SITING COORDINATION

Mr. Michael Halpin, Administrator
Siting Coordination Office
Department of Environmental Protection
2600 Blair Stone Road, MS-48
Tallahassee, FL 32399-2400

Re: Seminole Electric Cooperative, Inc.
Seminole Generating Station
Power Plant Certification No. 78-10
Post-Certification Amendment to Application

Dear Mr. Halpin:

Pursuant to Department of Environmental Protection Rule 62-17.205(1), F.A.C., please accept this letter and the attachments thereto as a proposed post-certification amendment to Seminole Electric Cooperative, Inc.'s (Seminole's) original Site Certification Application (SCA) for the existing electric generating plant in Putnam County. This post-certification amendment to the SCA addresses prospective installation of a double liner and associated leachate collection system on top of the existing flue gas desulfurization (FGD) landfill at the Seminole Generating Station.

More specifically, the proposed project involves construction of an approximately 18-acre double-lined landfill area on top of the existing landfill facility, which is currently approved for disposal of fly ash and miscellaneous wastes from the Seminole Generating Station within pozzocrete containments. The existing landfill has a base area of approximately 80 acres. In the western portion of the landfill top, the pozzocrete berm has an elevation of +185 feet (NGVD) and the landfill surface inside the berm is at an approximate elevation of +182 feet (NGVD). The eastern portion of the landfill top is currently being used for waste disposal, and is expected to have a pozzocrete berm elevation of approximately +185 feet (NGVD) and a landfill surface elevation of approximately +182 feet (NGVD) by the time of construction in the eastern portion of the landfill top. The lined landfill area will continue to be used for approved disposal of fly ash and miscellaneous wastes from the Seminole Generating Station.

Construction of the lined disposal area on top of the existing FGD sludge landfill will require construction of an earthen perimeter dike on top of an existing pozzocrete

berm constructed by Seminole personnel along the edge of the landfill top, and installation of a bottom liner system on the inside slope of the perimeter dike and the top surface of the existing landfill. In ascending order, the bottom liner, leachate collection and leak detection systems for the proposed lined disposal area, which will be constructed using geosynthetic products, will consist of the following elements:

- A geosynthetic clay liner (GCL) that serves as the liner system sub-base.
- A 60-mil thick lower textured high density polyethylene (HDPE) geomembrane liner that serves as the secondary leakage barrier.
- An HDPE geonet or geocomposite drainage net that serves as the leak detection layer.
- A 60-mil thick upper textured HDPE geomembrane liner that serves as the primary leakage barrier.
- An HDPE geocomposite drainage net that serves as part of the leachate collection system.

A 2-foot thick drainage sand layer, which will serve as part of the leachate collection and removal system and as a protective layer for the upper HDPE liner, will be placed over the upper geocomposite drainage net. Leachate collection piping will be installed in trenches to collect leachate from the geocomposite drainage nets for conveyance to a collection sump. A 6-inch diameter HDPE gravity pipeline will be installed to convey leachate from the collection sump/manhole to the existing Pond 9 located near the toe on the south side of the existing landfill. Water from Pond 9 including leachate from the lined landfill will be reused as makeup water in the plant FGD system and will continue to be treated in the existing on-site wastewater treatment facilities and discharged to the St. Johns River in accordance with existing NPDES Permit FL0036498. The projections of the impacts to the wastewater system have been reviewed through the NPDES permit modification process and Seminole has been told that it will be receiving the permit modification this month.

In sum, Seminole's proposed amendment to the Seminole Generating Station SCA consists of this letter and the associated construction drawings, which are set forth in the attached CD.

Seminole is filing this letter, and a hard-copy of the construction drawings along with a CD containing the construction drawings, with the Siting Office as well as the Department's Northeast District Office. Also, Seminole is providing a copy of this letter and a CD containing the construction drawings to all of the parties to the Seminole Generating Station PPSA process.

Mr. Michael Halpin, Administrator

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If you or any of the parties have any questions or concerns, or require additional information, please feel free to call Mike Roddy, Manager of Environmental Affairs, at (813) 963-0994.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael P. Petrovich". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Petrovich

Cc: Emerson Raulerson, DEP, NE District
Toni Sturtevant, DEP OGC
Service List