

Hopping Green & Sams

Attorneys and Counselors

March 10, 2010

Mr. Michael P. Halpin, P.E.
Program Administrator
Office of Siting Coordination
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Re: Seminole Electric Cooperative, Inc.
Seminole Generating Station, Putnam County, Florida
Power Plant Certification No. PA78-10
Post-Certification Amendment to Application

Dear Mr. Halpin:

Pursuant to Section 403.5113(1)(a), Florida Statutes, and Rule 62-17.205, Florida Administrative Code, please accept this letter and attachment hereto 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 to the Application addresses a proposed addition to the existing maintenance building, which is located on the certified site.

The new structure will be used for welding and will occupy approximately 2,000 square feet immediately north of the existing, certified maintenance building. Figure 1 (of Attachment A) depicts the location of the proposed structure. Because the proposed welding shop will increase the impervious surface area within the drainage basin associated with the existing, certified wet detention pond #1, Seminole contracted with Environmental Consulting & Technology, Inc. ("ECT") to survey all impervious surfaces within the drainage basin and review the design capacity of the wet detention pond. Attachment A to this letter contains ECT's findings and conclusions.

By way of background, wet detention pond #1 was constructed as part of the Units 1 and 2 Pollution Control Upgrade Project ("Upgrade Project"), which was approved by the Department in September 2006. The Department approved the air pollution control aspects of the Upgrade Project as a modification to the site certification for the Seminole Generating Station (see Department's final order modifying certification dated September 6, 2006), and approved the stormwater management aspects of the Upgrade Project as a post-certification amendment to the Application (see Department's final order approving post-certification amendment to the Application dated September 7, 2006). Prior to construction of wet detention pond #1, Seminole provided the Department with design notes and calculations from the engineering firm Burns &

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McDonnell (dated December 2006), which documented and verified, amongst other things, that wet detention pond #1 would comply with the requirements of Chapter 40C-42, Florida Administrative Code, including the requirement to contain and treat 2.5 inches of runoff from impervious surfaces within its drainage basin.

As indicated in Attachment A, the proposed welding shop will not impair the ability of wet detention pond #1 to continue to provide required levels of stormwater treatment because the structure will not increase the amount of impervious surface area within the drainage basin above the approved, regulatory-compliant design criteria for the same. Wet detention pond #1 has been designed so that its treatment volume can accommodate 2.5 inches of runoff from *at least* 1,176,169 square feet (27 acres) of impervious surface area within its drainage basin (the design treatment volume actually includes a 10% margin beyond that required to accommodate 2.5 inches of runoff from 27 acres of impervious surface). After construction of the proposed addition to the maintenance building, only 1,092,787 square feet (25.09 acres) of impervious surface will exist in the drainage basin.

In addition, neither construction nor operation of the proposed welding shop will cause any adverse environmental impacts or require any changes to the existing Conditions of Certification for the Seminole Generating Station. Construction of the welding shop will be conducted in accordance with existing Condition IV. Discharges associated with the stormwater treatment system will continue to comply with existing Condition II.

If the Department concurs, Seminole requests that this letter and its attachments be forwarded to all appropriate agencies and parties to the original certification proceeding as a permissible post-certification amendment to the Application. If you or any of the parties have any questions or concerns, or require additional information, please contact Seminole's Manager of Environmental Affairs, Mike Roddy, at (813) 963-0994, ext. 1224.

Very truly yours,



James S. Alves
Brian J. Accardo
Attorneys for Seminole Electric
Cooperative, Inc.

cc: Mike Roddy, Seminole
Robert Yarbrough, Seminole
Toni Sturtevant, Esq., DEP



Environmental Consulting & Technology, Inc.

March 5, 2010

Robert Yarbrough
Senior Environmental Engineer
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, FL 33688

**Subject: Seminole Electric Cooperative, Inc. Palatka Plant
Basin #1 Stormwater Report**

Dear Mr. Yarbrough:

On November 3, 2009, Seminole Electric Cooperative (SECI) requested that ECT evaluate whether SECI's proposed addition of a 2,000 sf welding shop to the existing Maintenance Building at the Seminole Generating Station would result in stormwater runoff to the wet detention pond #1 in excess of the pond's approved treatment capacity.

ECT began our investigation by reviewing documents provided by SECI, including AutoCAD files containing site layout and drainage basin information, as well as wet detention pond design notes and calculations prepared by Burns & McDonnell in 2006. This information was used to obtain approvals from DEP in 2006 for modifications to the facility associated with the Seminole Generating Station Units 1 and 2 Pollution Control Upgrade Project. After approval, wet detention pond #1 was constructed to treat runoff from Basin #1.

Subsequently, ECT personnel surveyed Basin #1 utilizing GIS/GPS technology to identify the impervious areas on site, which included the new impervious area planned adjacent to the Maintenance Building. Following field work, the GIS information obtained was overlaid on the AutoCAD map previously provided, and the CAD map was updated to reflect the existing and proposed conditions. At this point, existing/proposed impervious areas were summed and compared to the approved design criteria for wet detention pond #1, which the Burns & McDonnell report identifies. For purposes of this evaluation, areas that are compacted crushed rock or other similarly surfaced areas are considered impervious.

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According to the design notes and calculations previously approved by DEP, the allowable amount of impervious area within Basin #1 is 1,176,169 sf (27.0 ac). The existing/proposed condition impervious area as of the date of inspection, and including the proposed 2,000 sf welding shop, is 1,092,787 sf (25.09 ac) (See Figure #1). This leaves 83,382 sf (1.91 ac.) of available impervious surface area before the design conditions are exceeded. Therefore, the proposed 2,000 sf area to be constructed on will not adversely affect the ability of the existing pond to adequately provide stormwater treatment.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



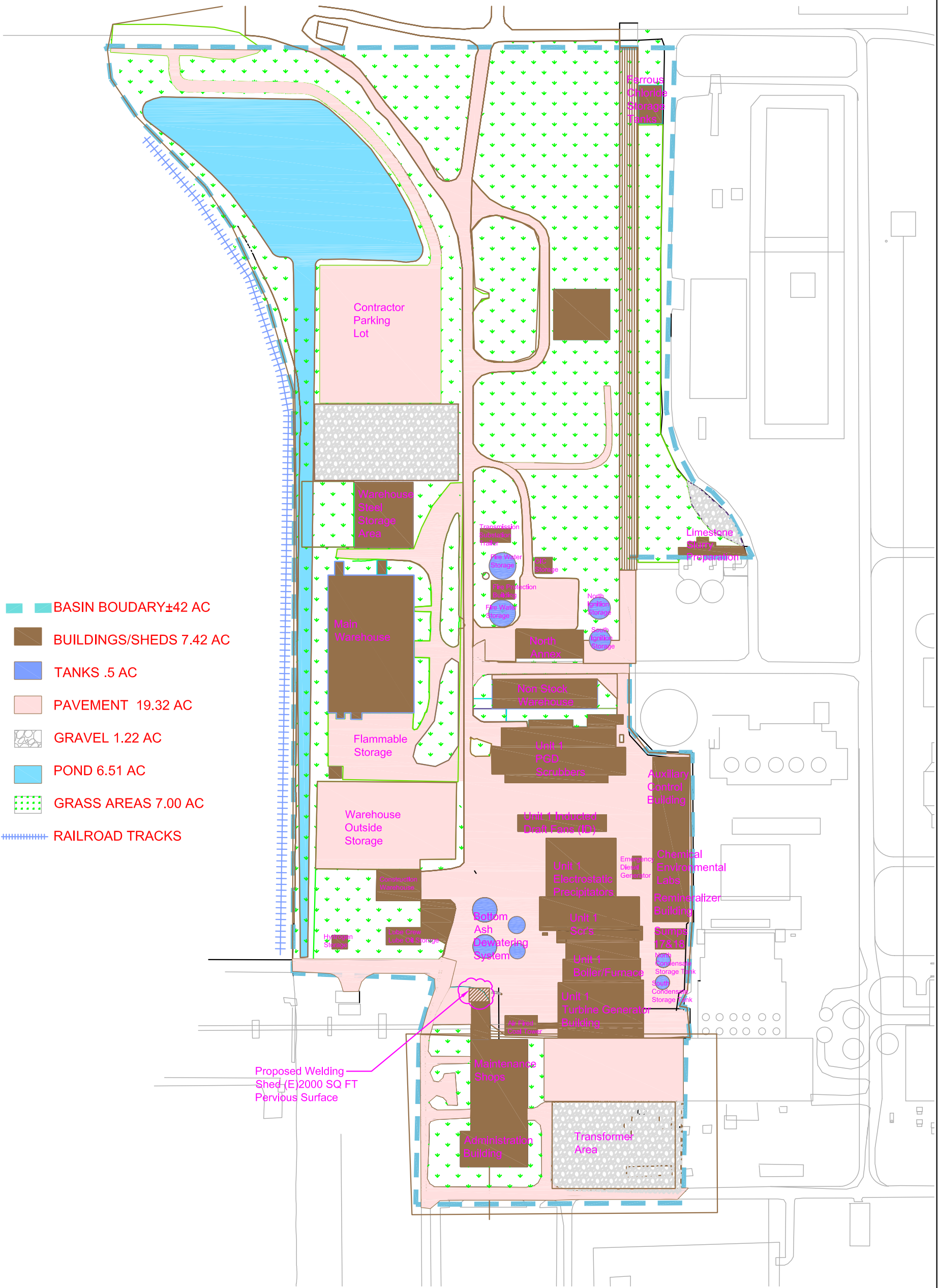
Steven G. Danskine, P.E.
Project Manager



Steven G. Danskine, P.E. 62496

3-5-10

Date



SEMINOLE ELECTRIC COOPERATIVE, INC.
PALATKA GENERATING FACILITY
STORMWATER BASIN #1 SHOWING BUILDINGS AND SURFACE TREATMENT

FIGURE#1

SOURCE: ECT 2010

SCALE :1" = 300'

