

P.E. CERTIFICATION STATEMENT

PERMITTEE

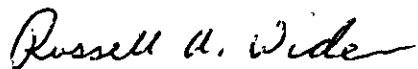
Reliant Energy Florida, L.L.C.
1000 Main Street
Houston, Texas 77002

Draft Air Permit No. 0090196-007-AC
Reliant Energy Indian River Plant
Unit 1 Igniter Replacement
Brevard County, Florida

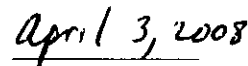
PROJECT DESCRIPTION

The proposed project is to replace the igniters on Unit 1 at the Indian River Plant. There are currently eight diesel-fired igniters in operation on Unit 1. The unit was originally designed and constructed with twelve igniters; however, four of the igniters have been taken out of service. The proposed activity is to replace the remaining eight igniters, and to install an additional four igniters to replace those taken out of service.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Russell A. Wider, P.E.
Registration Number: 66540



(Date)



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

April 3, 2008

Electronically Sent – Received Receipt Requested.

Mr. Matt Greek, Vice President, Gas Plant Operations: mgreek@reliant.com
Reliant Energy Florida, L.L.C.
1000 Main Street
Houston, Texas 77002

Re: DEP File No. 0090196-007-AC
Indiantown Cogeneration Plant

Dear Mr. Greek:

Enclosed is one copy of the Draft Air Construction Permit to replace the igniters on Unit 1 at the Indian River Plant in Titusville, Brevard County. The Department's Intent to Issue Air Construction Permit, the Technical Evaluation and Preliminary Determination, and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, such as a newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Russell A. Wider, P.E., Program Administrator, at the letterhead address. If you have any questions regarding this matter, please contact Tom Cascio at (850) 921-9526 or Mr. Wider at (850) 921-9527.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/raw/tbc

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Permit by:

Reliant Energy Florida, L.L.C.
1000 Main Street
Houston, Texas 77002

Draft Air Permit No. 0090196-007-AC
Reliant Energy Indian River Plant
Unit 1 Igniter Replacement
Brevard County, Florida

Authorized Representative:

Mr. Matt Greek, Vice President, Gas Plant
Operations

Facility Location: Reliant Energy Florida, L.L.C., operates the Reliant Energy Indian River Plant, located at US 1 and Kings Highway, Titusville, Brevard County.

Project: The applicant proposes the replacement of the igniters on Unit 1 at its facility in Titusville, Brevard County. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

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 proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. 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.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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 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 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, 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 14 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. If there are none, the petition must so state; (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 Intent to Issue Air Permit. 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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

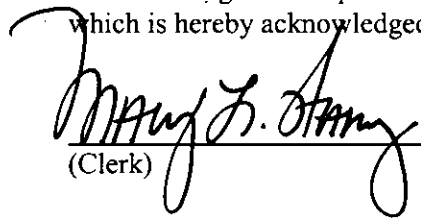
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft permit) and were sent by electronic mail, with received receipt requested before the close of business on 4/3/08 to the persons listed below:

Matt Greek, Reliant Energy Florida, L.L.C.: mgreek@reliant.com
Jim Bradner, P.E., Central District Office: James.Bradner@dep.state.fl.us
Michelle F. Duncan, Reliant Energy Florida, L.L.C.: mduncan@reliant.com
Katy Forney, EPA Region 4: forney.kathleen@epa.gov
James Little, EPA Region 4: little.james@epa.gov

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) _____

4/3/08
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Permit No. 0090196-007-AC
Reliant Energy Florida, L.L.C.
Reliant Energy Indian River Plant
Brevard County

Applicant: The applicant for this project is Reliant Energy Florida, L.L.C. The applicant's authorized representative and mailing address are: Matt Greek, Vice President, Gas Plant Operations, Reliant Energy Florida, L.L.C., 1000 Main Street, Houston, Texas 77002.

Facility Location: Reliant Energy Florida, L.L.C., operates the Reliant Energy Indian River Plant, located at US 1 and Kings Highway, Titusville, Brevard County.

Project: Reliant Energy Florida, L.L.C., requests to replace the igniters on Unit 1 at the Indian River Plant. There are currently eight diesel-fired igniters in operation on Unit 1. The unit was originally designed and constructed with 12 igniters; however, four of the igniters have been taken out of service. The proposed activity is to replace the remaining eight igniters, and to install an additional four igniters to replace those that were taken out of service. Replacement of the igniters is considered a physical change to an existing emission unit. The new igniters will have no impact on the main operational characteristics of Unit 1, i.e., its ability to generate electricity. The current igniters are rated at 0.75 million British thermal units per hour (mmBtu/hr) heat input and burn No. 2 fuel oil. The replacement igniters are only manufactured down to a size of 1.0 mmBtu/hr; therefore, an incremental 0.25 mmBtu/hr was used to calculate the potential emissions increase. Based on the above information, the Department concluded that the proposed change will not result in a significant net emissions increase, and thus it is not necessary to perform a review for prevention of significant deterioration.

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 proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. 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.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be postmarked by

the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, 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 14 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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 Public Notice of Intent to Issue Air Permit. 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 for this proceeding.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 0090196-007-AC
Unit 1 Igniter Replacement

COUNTY

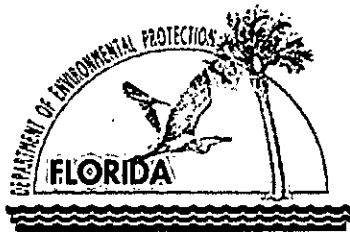
Brevard

APPLICANT

Reliant Energy Florida, L.L.C.
Reliant Energy Indian River Plant
ARMS Facility ID No. 0090196

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Title V Section



April 1, 2008

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

Reliant Energy Florida, L.L.C.
1000 Main Street
Houston, Texas 77002

Authorized Representative:

Mr. Matt Greek, Vice President, Gas Plant Operations

Processing Schedule

March 11, 2008: Received application to construct; application deemed complete.

April 3, 2008: Distributed Intent to Issue Air Construction Permit.

Facility Description and Location

This facility consists of three boilers and a lime storage silo. Also included at this site are miscellaneous unregulated and insignificant emissions units and activities. Emissions Units 001, 002 and 003 consist of three Combustion Engineering Steam Generators. The boilers are permitted to burn a variable combination of natural gas, propane, No. 6 and No. 2 fuel oils, and on-specification used oil. Emissions units 001 and 002 share a common stack, with a height of 300 feet. Emissions unit 003 has a separate 300 foot stack. Unit 001 began operation on February 1, 1960; Unit 002 on September 1, 1964; and Unit 003 on February 1, 1974. Compliance assurance monitoring (CAM) does not apply to these emissions units because there are no add-on pollution control devices installed.

Emissions Unit 008 is a lime storage silo filling system. The silo is equipped with a fabric filter baghouse made by General Resource Corporation, Model 13204.8. The baghouse is approximately 99 percent efficient in controlling particulate matter emissions. This source is located at the water treatment building. The silo began operation on February 25, 1993. Compliance assurance monitoring does not apply to this emissions unit because the pre-control potential to emit particulate matter is below the threshold amount of 100 tons per year.

This facility is located at US 1 and Kings Highway, Titusville, Brevard County, 32780; UTM Coordinates: Zone 17, 521.5 km East and 3151.6 km North; Latitude: 28° 29' 32" North and Longitude: 80° 46' 59" West.

Major Regulatory Categories

The key regulatory provisions applicable to the facility are:

Title I, Part C, Clean Air Act (CAA): The facility is located in an area that is designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard (NAAQS). It is classified as a "fossil fuel-fired steam electric plant of more than 250 million BTU per hour of heat input", which is one of the 28 Prevention of Significant Deterioration (PSD) Major Facility Categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a "major stationary source" of air pollution with respect to Rule 62-212.400, Florida Administrative Code (F.A.C.), Prevention of Significant Deterioration of Air Quality.

Title I, Section 112, CAA: The facility is a "Major Source" of hazardous air pollutants (HAP).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Title V, CAA: The facility is a Title V or "Major Source of Air Pollution" in accordance with Chapter 62-213, F.A.C., because the potential emissions of at least one regulated pollutant exceed 100 tons per year. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC). The plant currently operates under Title V Air Operation Permit No. 0090196-005-AV.

CAIR: The facility is subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by FDEP in Rule 62-296.470, Florida Administrative Code (F.A.C.).

Proposed Project

The proposed project is to replace the igniters on Unit 1 at the Indian River Plant. There are currently eight diesel-fired igniters in operation on Unit 1. The unit was originally designed and constructed with 12 igniters; however, four of the igniters have been taken out of service. The proposed activity is to replace the remaining eight igniters, and to install an additional four igniters to replace those that were taken out of service.

Replacement of the igniters is considered a physical change to an existing emission unit; therefore a demonstration must be made to determine if the physical change will result in a significant net emissions increase of any criteria pollutant. The new igniters will have no impact on the main operational characteristics of Unit 1, i.e., its ability to generate electricity, or its ability to run more hours, etc.

The current igniters are rated at 0.75 million British thermal units per hour (mmBtu/hr) heat input and burn No. 2 fuel oil. The replacement igniters are only manufactured down to a size of 1.0 mmBtu/hr; therefore, an incremental 0.25 mmBtu/hr will be used to calculate the potential emissions increase. Since Unit 1 only has eight burners currently in service, the full 1.0 mmBtu/hr for the four additional burners is used in the calculation below.

The estimated additional heat input to Unit 1 due to the igniter replacement project is therefore:

$$8 \times (0.25) + 4 = 6 \text{ mmBtu/hr}$$

The igniters will be outfitted with a new control system. The existing controls for the igniters are based on pneumatic and manual operation. The new system will be electronic. The electronic controls are more precise and can be operated from the control room. The new system should use less No. 2 fuel overall per unit startup. The igniters will only be used during startup of the unit; however, to estimate worst-case conditions, the calculations below assume that each igniter has the ability to run 8,400 hours per year, which is the annual operating limit for the three generating units. The new igniters will also be able to fire natural gas, but for the purposes of this demonstration it was assumed by the applicant that No. 2 fuel oil was used for the entire 8,400 hours since combustion of fuel oil has higher emissions than that of natural gas.

2. EFFECTS ON EMISSIONS

Applicant's Basic Analysis

To estimate potential emissions from the injectors, the applicant used the Environmental Protection Agency's publication "Compilation of Air Emission Factors AP-42", Section 1.3 for combustion of No. 2 fuel oil. Emission factors were taken from the "Residential Furnace" section of Tables 1.3-1 and 1.3-3 to simulate a low heat input burner. Other factors were also taken from Tables 1.3-2 and 1.3-11. The table below shows a summary of the expected additional emissions. Note that the criteria pollutants are listed in tons per year.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Pollutant	Emission Factor (lb/1000gal)	Conversion to lb/mmBtu	mmBtu/hr*	Hours per Year	Tons per Year
NO _x	18	0.12	6	8400	3.02
SO ₂	5.68	0.04	6	8400	0.95
CO	5	0.03	6	8400	0.84
PM	1.9	0.01	6	8400	0.32
VOC	2.493	0.02	6	8400	0.42

Based on the above information, the applicant concluded that the proposed change will not result in a significant net emissions increase and thus it is not necessary to perform a review for prevention of significant deterioration. The applicant requested that this project be approved as an air construction permitting action. Also, since no changes to any existing permit condition are warranted, there may be no need to revise the facility's Title V air operation permit.

3. REGULATIONS THAT APPLY TO THE PROJECT

Applicable State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

Applicable Regulations
Rule 62-4, F.A.C. (Permitting Requirements)
Rule 62-204, F.A.C. (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference)
Rule 62-210, F.A.C. (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms)
Rule 62-212, F.A.C. (Preconstruction Review, PSD Review and BACT)
Rule 62-213, F.A.C. (Title V Air Operation Permits for Major Sources of Air Pollution)
Rule 62-296, F.A.C. (Emission Limiting Standards)
Rule 62-297, F.A.C. (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures)

4. DETERMINATION WHETHER PROJECT IS A (NON-MAJOR) MODIFICATION

Per Rule 62-210.200(203), F.A.C., a modification is defined as follows:

"Modification" – Any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility.

(a) *A physical change or change in the method of operation shall not include:*

1. *Routine maintenance, repair, or replacement of component parts of an emissions unit; or*
2. *A change in ownership of an emissions unit or facility.*

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

(b) & (c) (Not relevant in this analysis)

The replacement of the Unit 1 igniters is a physical change that involves additional components. It is not routine maintenance, repair or replacement of component parts of an emissions unit. If increases in actual emissions accompany the physical change, then the project constitutes a modification.

Per Rule 62-210.200(11), F.A.C., actual emissions are defined as follows:

“Actual Emissions” – The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department shall allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit’s actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

Baseline actual emissions are calculated as reported in Annual Operating Reports in tons per year (TPY) as noted below:

Year	NO _x	SO ₂	CO	PM	VOC
2005	155.4	495.5	12.8	27.8	2.7
2006	48.3	150.7	4.8	7.9	0.7
Average	101.85	323.1	8.8	17.85	1.7

The following table is a comparison of baseline actual emissions from the Unit 1 preceding the planned igniter replacement, and the potential emissions of the unit following implementation.

Pollutant	Actual Emissions 2005-2006 (tons per year)	Potential Emissions (tons per year) (with planned igniter replacement)	Calculated Increase (tons per year)	PSD Significant Emission Rate
NO _x	101.85	104.87	3.02	40
SO ₂	323.1	324.05	0.95	40
CO	8.8	9.64	0.84	100
PM	17.85	18.17	0.32	25
VOC	1.7	2.12	0.42	40

Based on the foregoing analysis, the Unit 1 Igniter Replacement project constitutes a (non-major) modification with respect to the Department’s rules and requires a construction permit.

5. OTHER APPLICABLE REGULATIONS

The requirements already listed in the facility’s existing Title V Air Operation Permit No. 0090196-005-AV are comprehensive and sufficient for the future operation of the facility. The main additional requirement is for an air construction permit pursuant to Rules 62-4, 62-210 and 62-212.300, F.A.C., to proceed with the project.



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

PERMITTEE

Reliant Energy Florida, L.L.C.
1000 Main Street
Houston, Texas 77002

Authorized Representative:

Mr. Matt Greek, Vice President, Gas Plant Operations

Air Permit No. 0090196-007-AC
Reliant Energy Indian River Plant
SIC No. 4931
Facility ID No. 0090196
Unit 1 Igniter Replacement

Permit Expires: March 31, 2009

PROJECT AND LOCATION

This permit authorizes replacement of the igniters on Unit 1 at the Indian River Plant (the facility). The facility is located at US 1 and Kings Highway, Titusville, Brevard County, 32780; UTM Coordinates: Zone 17, 521.5 km East and 3151.6 km North; Latitude: 28° 29' 32" North and Longitude: 80° 46' 59" West.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 60 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans and other documents on file with the Department.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

This facility consists of three boilers and a lime storage silo. Also included at this site are miscellaneous unregulated and insignificant emissions units and activities. Emissions Units 001, 002 and 003 consist of three Combustion Engineering Steam Generators. The boilers are permitted to burn a variable combination of natural gas, propane, No. 6 and No. 2 fuel oils, and on-specification used oil. Emissions units 001 and 002 share a common stack, with a height of 300 feet. Emissions unit 003 has a separate 300 foot stack. Unit 001 began operation on February 1, 1960; Unit 002 on September 1, 1964; and Unit 003 on February 1, 1974. Compliance assurance monitoring (CAM) does not apply to these emissions units because there are no add-on pollution control devices installed.

Emissions Unit 008 is a lime storage silo filling system. The silo is equipped with a fabric filter baghouse made by General Resource Corporation, Model 13204.8. The baghouse is approximately 99 percent efficient in controlling particulate matter emissions. This source is located at the water treatment building. The silo began operation on February 25, 1993. CAM does not apply to this emissions unit because the pre-control potential to emit particulate matter is below the threshold amount of 100 tons per year.

This facility is located at US 1 and Kings Highway, Titusville, Brevard County, 32780; UTM Coordinates: Zone 17, 521.5 km East and 3151.6 km North; Latitude: 28° 29' 32" North and Longitude: 80° 46' 59" West.

The proposed project is to replace the igniters on Unit 1 at the Indian River Plant. There are currently eight diesel-fired igniters in operation on Unit 1. The unit was originally designed and constructed with 12 igniters; however, four of the igniters have been taken out of service. The proposed activity is to replace the remaining eight igniters, and to install an additional four igniters to replace those that were taken out of service.

The new igniters will also be able to fire natural gas, but for the purposes of this demonstration it was assumed by the applicant that No. 2 fuel oil was used for the entire 8,400 hours since combustion of fuel oil has higher emissions than that of natural gas.

ID	Emission Unit Description
001	87 MW Unit No. 1 Boiler

REGULATORY CLASSIFICATION

NESHAP: The facility is a potential major source of hazardous air pollutants. The facility does not operate units subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 63.

Title IV: The facility does operate existing units subject to the Acid Rain provisions of the Clean Air Act (CAA).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major stationary source in accordance with Rule 62-212.400, F.A.C.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR).

SECTION 1. GENERAL INFORMATION

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete; and the Department's Technical Evaluation and Preliminary Determination.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address and phone number of the Central District Office are: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767, Telephone: 407/894-7555, Fax: 407/897-2996.
3. Appendices: The following Appendices are attached as part of this permit: Appendix GC (General Conditions); and Appendix C (Common State Regulatory Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

This section of the permit addresses the following emissions unit.

AIR RESOURCE MANAGEMENT SYSTEM (ARMS) Emissions Unit 001

Emissions unit 001 consists of a Combustion Engineering Steam Generator. The boiler may burn a variable combination of natural gas, propane, No. 6 and No. 2 fuel oils, and on-specification used oil. Emissions unit 001 shares a common stack with Unit 002, with a height of 300 feet. Unit 001 began operation on February 1, 1960. Compliance assurance monitoring does not apply to this emissions unit because there are no add-on pollution control devices installed.

{Permitting Note: The unit remains subject to the applicable requirements of current Title V Air Operation Permit No. 0090196-005-AV.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc.
[Rule 62-4.070, F.A.C.]

EQUIPMENT AND PERFORMANCE RESTRICTIONS

2. Unit 1 Igniter Replacement: This permit authorizes the replacement of the igniters on Unit 1 at the Indian River Plant. There are currently eight diesel-fired igniters in operation on Unit 1. The unit was originally designed and constructed with 12 igniters; however, four of the igniters have been taken out of service. The proposed activity is to replace the remaining eight igniters, and to install an additional four igniters to replace those that were taken out of service.
[Applicant request.]

NOTIFICATIONS, RECORDS AND REPORTS

3. Construction Notifications: Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDIX C
COMMON STATE REGULATORY REQUIREMENTS

{Permitting Note: Unless otherwise specified by permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(217), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

SECTION 4. APPENDIX C
COMMON STATE REGULATORY REQUIREMENTS

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.[Rule 62-297.310(4), F.A.C.]
14. Determination of Process Variables:
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.[Rule 62-297.310(5), F.A.C.]
15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to

SECTION 4. APPENDIX C
COMMON STATE REGULATORY REQUIREMENTS

determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

SECTION 4. APPENDIX GC

General Permit Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

SECTION 4. APPENDIX GC

General Permit Conditions

arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

MEMORANDUM

To: Trina Vielhauer

Through: Russell Wider *RW*

From: Tom Cascio *Tom*

Date: April 1, 2008

Subject: Draft Air Construction Permit No. **0090196-007-AC**
Reliant Energy Indian River Plant

The proposed project is to replace the igniters on Unit 1 at the Indian River Plant. There are currently eight diesel-fired igniters in operation on Unit 1. The unit was originally designed and constructed with 12 igniters; however, four of the igniters have been taken out of service. The proposed activity is to replace the remaining eight igniters, and to install an additional four igniters to replace those that were taken out of service.

Replacement of the igniters is considered a physical change to an existing emission unit. The current igniters are rated at 0.75 million British thermal units per hour (mmBtu/hr) heat input and burn No. 2 fuel oil. The replacement igniters are only manufactured down to a size of 1.0 mmBtu/hr; therefore, an incremental 0.25 mmBtu/hr was used to calculate the potential emissions increase. Based on our analysis, we concluded that the proposed change will not result in a significant net emissions increase, and thus it was not necessary to perform a review for prevention of significant deterioration.

This facility is an existing major PSD source. The Unit 1 igniter replacement project will have a minimal effect on all criteria and hazardous air pollutant emissions.

The application was deemed complete on March 11, 2008. Day 90 is June 9, 2008.

We recommend your signature and forwarding to Elizabeth for clerking.

Harvey, Mary

From: Harvey, Mary
Sent: Thursday, April 03, 2008 3:03 PM
To: 'Matt Greek, Reliant Energy Florida, L.L.C.'; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.'; 'Katy Forney, EPA Region 4.'; 'James Little, EPA Region 4.'
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -
Attachments: 0090196.007.AC.D_pdf.zip

Tracking:	Recipient	Delivery	Read
	'Matt Greek, Reliant Energy Florida, L.L.C.'		
	Bradner, James	Delivered: 4/3/2008 3:29 PM	
	'Michelle F. Duncan, Reliant Energy Florida, L.L.C.'		
	'Katy Forney, EPA Region 4.'		
	'James Little, EPA Region 4.'		
	Cascio, Tom	Delivered: 4/3/2008 3:03 PM	Read: 4/3/2008 3:04 PM
	Wider, Russell	Delivered: 4/3/2008 3:03 PM	Read: 4/3/2008 3:14 PM
	Walker, Elizabeth (AIR)	Delivered: 4/3/2008 3:03 PM	
	Gibson, Victoria	Delivered: 4/3/2008 3:03 PM	Read: 4/3/2008 3:11 PM

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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: Cascio, Tom
To: Harvey, Mary
Sent: Thursday, April 03, 2008 3:04 PM
Subject: Read: Reliant Energy Florida, L.L.C. -

Your message

To: 'Matt Greek, Reliant Energy Florida, L.L.C.:'; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.:'; 'Katy Forney, EPA Region 4:'; 'James Little, EPA Region 4:'
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -
Sent: 4/3/2008 3:03 PM

was read on 4/3/2008 3:04 PM.

Harvey, Mary

From: Duncan, Michelle F. [MFDuncan@reliant.com]
Sent: Friday, April 04, 2008 2:28 PM
To: Harvey, Mary
Subject: RE: Reliant Energy Florida, L.L.C. -

Thank you

Michelle F. Duncan

Reliant Energy

121 Champion Way, Suite 200, Canonsburg, PA 15317
724-597-8631 desk phone 724-597-8870 fax
mfduncan@reliant.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, April 03, 2008 3:03 PM
To: Greek, Matt E.; Bradner, James; Duncan, Michelle F.; Katy Forney, EPA Region 4; James Little, EPA Region 4;
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -

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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.

4/4/2008

Harvey, Mary

From: Wider, Russell
To: Harvey, Mary
Sent: Thursday, April 03, 2008 3:14 PM
Subject: Read: Reliant Energy Florida, L.L.C. -

Your message

To: 'Matt Greek, Reliant Energy Florida, L.L.C.'; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.'; 'Katy Forney, EPA Region 4'; 'James Little, EPA Region 4'
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -
Sent: 4/3/2008 3:03 PM

was read on 4/3/2008 3:14 PM.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Thursday, April 03, 2008 3:11 PM
Subject: Read: Reliant Energy Florida, L.L.C. -

Your message

To: 'Matt Greek, Reliant Energy Florida, L.L.C.:'; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.:'; 'Katy Forney, EPA Region 4:'; 'James Little, EPA Region 4:'
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -
Sent: 4/3/2008 3:03 PM

was read on 4/3/2008 3:11 PM.

Harvey, Mary

From: Cascio, Tom
To: Harvey, Mary
Sent: Thursday, April 03, 2008 3:04 PM
Subject: Read: Reliant Energy Florida, L.L.C. -

Your message

To: 'Matt Greek, Reliant Energy Florida, L.L.C.':; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.':; 'Katy Forney, EPA Region 4:':; 'James Little, EPA Region 4:'
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -
Sent: 4/3/2008 3:03 PM

was read on 4/3/2008 3:04 PM.

Harvey, Mary

From: Duncan, Michelle F. [MFDuncan@reliant.com]
To: Harvey, Mary
Sent: Thursday, April 03, 2008 3:21 PM
Subject: Read: Reliant Energy Florida, L.L.C. -

Your message

To: MFDuncan@reliant.com
Subject:

was read on 4/3/2008 3:21 PM.

Harvey, Mary

From: Greek, Matt E. [MGreek@reliant.com]
To: Harvey, Mary
Sent: Thursday, April 03, 2008 4:52 PM
Subject: Read: Reliant Energy Florida, L.L.C. -

Your message

To: MGreek@reliant.com
Subject:

was read on 4/3/2008 4:52 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Friday, April 04, 2008 1:22 PM
To: Harvey, Mary
Subject: Re: FW: Reliant Energy Florida, L.L.C. -

thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30303

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

04/03/2008 03:28
PM

To
Kathleen Forney/R4/USEPA/US@EPA
cc
Subject
FW: Reliant Energy Florida,
L.L.C. -

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From: Harvey, Mary
Sent: Thursday, April 03, 2008 3:03 PM
To: 'Matt Greek, Reliant Energy Florida, L.L.C.':; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.':; 'Katy Forney, EPA Region 4:':; 'James Little, EPA Region 4:':
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Reliant Energy Florida, L.L.C. -

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Harvey, Mary

From: Bradner, James
Sent: Thursday, April 03, 2008 4:03 PM
To: Harvey, Mary
Subject: RE: Reliant Energy Florida, L.L.C. -

Received—thank you.

From: Harvey, Mary
Sent: Thursday, April 03, 2008 3:03 PM
To: 'Matt Greek, Reliant Energy Florida, L.L.C.:'; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.:'; 'Katy Forney, EPA Region 4:'; 'James Little, EPA Region 4:'
Cc: Cascio, Tom; Wider, Russell; Walker, Elizabeth (AIR); Gibson, Victoria
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Your message

To: 'Matt Greek, Reliant Energy Florida, L.L.C.':; Bradner, James; 'Michelle F. Duncan, Reliant Energy Florida, L.L.C.':; 'Katy Forney, EPA Region 4:':; 'James Little, EPA Region 4:'
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Subject: Reliant Energy Florida, L.L.C. -
Sent: 4/3/2008 3:03 PM

was read on 4/3/2008 4:02 PM.