



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

Certified Mail – Return Receipt Requested

June 8, 2006

Mr. Terry E. Gish  
Managing Director, Southeast Operations  
Reliant Energy Indian River, L.L.C.  
7800 South U.S. Highway One  
Titusville, FL 32780

Re: Title V Permit Revision Application  
Project No. 0090196-006-AV  
**Reliant Energy Indian River Plant**

Dear Mr. Gish:

We have reviewed your Title V permit revision application received on April 12, 2006, and have deemed the application incomplete. The application is essentially a request to remove (or alternately to raise) the heat input limits in the Title V permit for the three boilers at the Indian River plant. The oldest document that we have on record in our Bureau that has these limits specified is air operating permit AO05-183384, issued by the Department's Central District on April 26, 1991. It appears that this document is the basis for Specific Condition A.1. in the Title V permit. The limits are also included in the original Title V permit application submitted by the Orlando Utilities Commission (OUC) in 1996. Therefore, to help us complete our review, please provide information on the following items:

- It appears that the requested heat input limits specified in your application are greater than the recommended limits noted in OUC's letter dated July 24, 1975, based on the boiler manufacturer's data. Have you made any improvements at the facility to justify resetting the limits at higher levels? Please explain.
- It is expected that to increase the hourly heat input limits in the facility's current Title V permit will result in corresponding increases in the potential to emit (PTE) values for particulate matter and sulfur dioxide, since both pollutants have limits expressed in pounds per million Btu heat input units. Please provide an estimate of the PTE increases expected from raising the hourly heat input values. If the expected rate emissions increases are significant based on Department Rules 62-212.400, F.A.C. (Prevention of Significant Deterioration), and 62-210.200(242), F.A.C. (Definitions), and thus trigger PSD review, please provide a BACT analysis for this operational change, or measures to assure PSD applicability does not apply.

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*Printed on recycled paper.*

Mr. Terry E. Gish  
Reliant Energy Indian River, L.L.C.  
June 8, 2006

The Applicability section of Rule 62-212.400, F.A.C., states:

“The Department shall determine whether a major modification will occur for each PSD pollutant as follows:

1. Baseline Actual-to-Projected Actual Applicability Test for Modifications at Existing Emissions Units. A significant emissions increase of a PSD pollutant will occur if the difference, or the sum of the differences if more than one emissions unit is involved, between the projected actual emissions and the baseline actual emissions equals or exceeds the significant emissions rate for that pollutant.”

When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Sincerely,



A. A. Linero, P.E.  
Program Administrator  
Permitting South Section

Cc: Joe Araiza, Reliant Energy ([jariaza@reliant.com](mailto:jariaza@reliant.com))  
Len Kozlov, P.E., Central District Office

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Mr. Terry E. Gish, Managing Director

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 Mr. Terry E. Gish, Managing Director  
 Street, Apt. No.,  
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 Titusville, FL 32780

PS Form 3800, June 2002 See Reverse for Instructions

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 Mr. Terry E. Gish  
 Managing Director, Southeast Operations  
 Reliant Energy Indian River, L.L.C.  
 7800 South U.S. Highway One  
 Titusville, FL 32780

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