

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

May 27, 2009

Electronic Mail – Received Receipt Requested

Dennis Shaulis
General Manager, RRI Energy, L.L.C. - Indian River Plant
7800 South U.S. 1
Titusville, Florida 32780

Re: **Request for Additional Information**
Project No. 0090196-010-AC
RRI Energy, L.L.C. - Indian River Plant
Boiler 1 and 3 Heat Input Increase

Dear Mr. Shaulis:

On April 28, 2009 we received your application and sufficient fee for an air construction permit requesting approximately a 7% heat input increase for Boilers 1 and 3 at the Indian River Plant. The facility is located in Brevard County at US 1 and Kings Highway in Titusville, Florida. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Provide data supporting the requested short-term heat input rates during normal operation. Please document the total number of hours and the maximum heat inputs realized for each "over-pressure" excursion above the permitted heat input limits for the 2004-2008 baseline emission period. Data from any periods of operation over the permitted capacity should be excluded from the baseline actual emissions.
2. Please provide the actual annual heat input rates and megawatt-hours from 1999 to 2008. Justify the hours of estimated incremental annual operation for both boilers at the requested increased heat input limits. Please provide the 5 year projection of heat input rates based on actual predicted electrical energy demand.
3. Please recalculate the estimated emissions increases expected from the requested higher heat input rates. Compare the projected actual emissions to baseline actual emissions as defined in Rules 62-210.200, 62-210.370, and 62-212.300, F.A.C. Baseline actual emissions must be calculated following the hierarchy and methods in Rule 62-210.370, F.A.C. Projected actual emissions should reflect the expected actual plant operating parameters based on the plant's predicted demand for electrical energy for 5 years after the project. Any site specific emissions data used to estimate projected actual emissions should be based on the five-year average encompassing the period over which the emissions are being computed. Will the predicted increases exceed the significant emissions rates and subject the project to Rule 62-212.400, F.A.C for the Prevention of Significant Deterioration (PSD) of Air Quality?

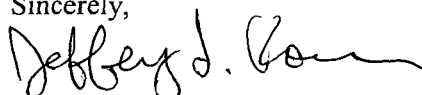
REQUEST FOR ADDITIONAL INFORMATION

4. Submit corrected emissions unit pollutant detail information forms for each PSD pollutant. The completed forms must include baseline actual emissions, projected actual emissions, the baseline 24-month period and the projected monitoring period.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Thomas, at 850/921-7744.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Dennis Shaulis, RRI Energy, L.L.C.: (dshaulis@reliant.com)

Mr. Gary Mauzy, RRI Energy, L.L.C.: (gmauzy@reliant.com)

Ms. Caroline Shine, DEP Central District Office: (caroline.shine@dep.state.fl.us)

Ms Aimee Andrews, Trinity Cosultants: (aandrews@trinityconsultants.com)

Mr. Michael Ballenger, Trinity Consultants: (mballeng@trinityconsultants.com)

Ms. Katy Forney, United States Environmental Protection Agency-Region 4 (forney.kathleen@epa.gov)

Ms. Vickie Gibson, DEP-BAR (victoria.gibson@dep.state.fl.us) (for read file)

JFK/bxt

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, May 27, 2009 3:57 PM
To: 'dshaulis@reliant.com'
Cc: 'gmauzy@reliant.com'; Shine, Caroline; 'aandrews@trinityconsultants.com'; 'mballeng@trinityconsultants.com'; 'forney.kathleen@epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - RRI Energy, L.L.C. - Indian River Plant (0090196-010-AC)
Attachments: RAI 0090196-010-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Shaulis, Dennis D [DShaulis@rrienergy.com]
Sent: Wednesday, June 03, 2009 2:38 PM
To: Livingston, Sylvia
Subject: RE: RAI - RRI Energy, L.L.C. - Indian River Plant (0090196-010-AC)

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, May 27, 2009 3:57 PM
To: Shaulis, Dennis D
Cc: Mauzy Jr, Gary L; Shine, Caroline; aandrews@trinityconsultants.com; mballeng@trinityconsultants.com; forney.kathleen@epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI - RRI Energy, L.L.C. - Indian River Plant (0090196-010-AC)

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

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.

Livingston, Sylvia

From: Mauzy Jr, Gary L [GMauzy@rrienergy.com]
Sent: Thursday, May 28, 2009 10:28 AM
To: Livingston, Sylvia
Subject: RE: RAI - RRI Energy, L.L.C. - Indian River Plant (0090196-010-AC)

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, May 27, 2009 3:57 PM
To: Shaulis, Dennis D
Cc: Mauzy Jr, Gary L; Shine, Caroline; aandrews@trinityconsultants.com; mballeng@trinityconsultants.com; forney.kathleen@epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
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Livingston, Sylvia

From: Michael Ballenger [MBalleng@trinityconsultants.com]
Sent: Wednesday, May 27, 2009 4:07 PM
To: Livingston, Sylvia
Subject: Re: RAI - RRI Energy, L.L.C. - Indian River Plant (0090196-010-AC)

I can view the attached RAI.

Thanks,

Michael Ballenger
4767 New Broad Street
Orlando, FL 32814
(407) 514-2632
Fax: (407) 641-8911

From: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>
To: <dshaulis@reliant.com>
Cc: <gmauzy@reliant.com>, "Shine, Caroline" <Caroline.Shine@dep.state.fl.us>, <aandrews@trinityconsultants.com>, <mballeng@trinityconsultants.com>, <forney.kathleen@epa.gov>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>, "Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>
Date: 05/27/2009 03:57 PM
Subject: RAI - RRI Energy, L.L.C. - Indian River Plant (0090196-010-AC)

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Sylvia Livingston
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