

Sheplak, Scott

From: Kuberski, Garry
Sent: Monday, January 28, 2002 4:21 PM
To: Sheplak, Scott
Cc: Kozlov, Leonard; Turner, John B.
Subject: Permit 0090196-001-AV, Reliant Energy Indian River, L.L.C.

Tom Cascio has advised me that Conditions A25 and A26 of Permit 0090196-001-AV, Reliant Energy Indian River, L.L.C., were an error and should not be in the permit.

Permit correction is requested.

These conditions contained substantial annual and permit renewal stack test requirements. These conditions affect the EASIIR inspection reports and the ARMS compliance assurance reports. Correction of the ARMS data is also requested.

*Tom, please handle this correction.
This was our error.*

*S.H.
1/28*

321-264-4589

Amr

ADISE @

Permit.com

*7800 S. U.S. Hwy 7
Titusville, FL
32780*

Cascio, Tom

From: Sheplak, Scott
Sent: Friday, January 25, 2002 4:20 PM
To: Cascio, Tom
Subject: FW: Permit 0090196-001-AV, Reliant Energy Indian River, L.L.C.

please handle. get w/ Bruce if you need help or grab me.

-----Original Message-----

From: Kuberski, Garry
Sent: Friday, January 25, 2002 10:32 AM
To: Sheplak, Scott
Cc: Turner, John B.; Zahm, Alan; Kozlov, Leonard
Subject: Permit 0090196-001-AV, Reliant Energy Indian River, L.L.C.

Handwritten note:
KUBERSKI TO
REVIEW
PERMIT

While completing an inspection for Reliant Energy Indian River, L.L.C., questions concerning the interpretation of the permit have come up.

1. The boilers are equipped with NOx continuous emission monitors. However, the permit does not have an emission limit for NOx. Should there be an emission limit for NOx? We believe that the CEMS is required by the Acid Rain regulations, and there is no emission limit because these are pre NSPS boilers. Is this correct?
2. Conditions A18, A25, and A26 appear to have conflicting requirements. The questions and the conditions are listed below.
 - a. Condition A18 allows the use of Method 17. Conditions A25 and A26 do not allow the use of Method 17. Is Method 17 testing acceptable if the temperature requirement is met?
 - b. Is an annual compliance test for NOx, CO, and Be required? Is a VOC test required prior to permit renewal?
 - c. Does condition A25 apply only if on spec used oil was burned for more than 400 hours?

A.18. Particulate Matter. The test method for particulate emissions shall be EPA Method 17 incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. Reliant Energy may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 17.
[Rule 62-296.405(1)(e)2., F.A.C.]

A.25. The Permittee shall conduct a compliance test on an *annual basis* for each of the following pollutants. Each compliance test shall be conducted in accordance with 40 CFR 60, Appendix A, using the method indicated.

- a) Oxides of Nitrogen (NOx) - EPA Method 20.
- b) Carbon Monoxide (CO) - EPA Method 10.
- c) Beryllium (Be) - EPA Method 104.
- d) Particulate Matter (PM/PM₁₀) - EPA Method 5. *OR 17*

An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
[Rule 62-297.310(7)(a)4. & 5., F.A.C.]

A.26. The Permittee shall conduct a compliance test for each of the following pollutants *prior to obtaining a renewed operation permit*. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy this requirement. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a) 3.b., c., or d., F.A.C., the Department shall not require submission of compliance test results for any emissions unit that, during the year prior to renewal: a) did not operate; or b) in the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours. Each compliance test shall be conducted in accordance with 40 CFR 60 Appendix A, using the method indicated.

- a) Sulfur Dioxide (SO₂) - EPA Method 6 or ASTM D 2880-71 for sulfur in oil.
- b) Particulate Matter (PM/PM₁₀) - EPA Method 5. *OR 17 (SEE A.18.)*
- c) Volatile Organic Compounds (VOC) - EPA Method 25.

[Rule 62-297.310(7)(a)3., F.A.C.]