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SEP 21 2006

BUREAU OF AIR REGULATION

September 7, 2006

Trina L. Vielhauer
Chief, Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Title V Permit
Reliant Energy Indian River
Facility ID No. 0090196

Dear Ms. Vielhauer:

On April 12, 2006, Reliant Energy submitted a request for a revision to the Indian River Title V permit. The nature of the request was to either increase or remove the heat input limits contained in Condition A.1.

As was discussed in our meeting on August 29, 2006, we would like to modify the revision request. We withdraw the request to revise the current heat input limits and request to have language added to the permit that will allow compliance with the permitted heat inputs based on a daily average.

Below is the suggested modification to the permit language. We also request that the permitting note attached to Condition A.1 be removed since Condition A.21 sufficiently covers the requirements for conducting performance testing at maximum permitted capacity.

We request that the following language, "calculated based on a daily average" be added to Condition A.1:

A.1. Permitted Capacity. The maximum operating heat input rate, *calculated based on a daily average*, is as follows:

<u>Unit No.</u>	<u>Fuel Type</u>	<u>MMBtu/Hour</u>
1	Natural Gas	865.5
1	Oil	832.2
2	Natural Gas	2248.7
2	Oil	2016.5
3	Natural Gas	3208.5
3	Oil	3048.8

Additionally, on-specification used oil may be fired at the rate of the lesser of :

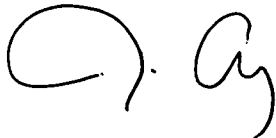
- a. Up to 1.5 million gallons per year; or
- b. the equivalent heat input of 10 percent or less of the permitted heat input of No. 6 Fuel Oil while combusting either No. 6 Fuel Oil or Natural Gas.

The Indian River units fire both gas and oil during a day, either separately or concurrently. The current compliance calculation takes a ratio of the gas-to-oil burned and uses that to weight the two compliance limits in Condition A.1 to calculate a single hourly compliance limit. That hourly compliance limit is then compared to the unit's hourly heat input rate to demonstrate compliance.

Reliant proposes to continue to use the calculation technique described above except that the compliance limit will be compared to the unit's daily averaged heat input rate.

Should you have any questions, please contact me at 713.488.7167.

Sincerely

A handwritten signature in black ink, appearing to read 'J. Araiza', written in a cursive style.

Joe Araiza
Senior Air Quality Engineer
Environmental Department

cc: Tom Cascio, Florida Department of Environmental Protection, Tallahassee

Adams, Patty

From: Linero, Alvaro
Sent: Friday, July 21, 2006 1:20 PM
To: Adams, Patty; Cascio, Tom
Subject: Indian River Permit Revision

Patty:
Would you mind helping me by adjusting the completeness date in accordance with the email below.

From: Araiza, Joseph P. [mailto:JAraiza@reliant.com]
Sent: Friday, July 21, 2006 1:14 PM
To: Cascio, Tom; Linero, Alvaro
Subject: Indian River Permit Revision

Tom and Al,

Per our recent discussion we understand that the 30-day completeness deadline for responding to our recent submittal of supplemental information ends on Sunday, July 23rd. We would like to extend that deadline to August 1st to provide your agency additional time to discuss our revision request.

Please let me know if you have any questions.

Sincerely,

Joe Araiza
Reliant Energy