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November 22, 1999

Mr. Michael P. Halpin, P.E.
New Source Review Division
Florida Department of Environmental Protection
2600 Blair Stone Road – MS #5505
Tallahassee, Florida 32399-2400

**Subject: Submittal of Publisher's Affidavit for Public Notification
Reliant Energy Osceola – Draft Air Construction Permit**

Dear Mr. Halpin:

Pursuant to the letter from the Florida Department of Environmental Protection (FDEP) dated November 8, 1999, Reliant Energy Osceola, L.L.C. (Reliant Energy) has provided public notification regarding its application for an air quality construction permit for the proposed Reliant Energy Osceola (Osceola) facility. In accordance with FDEP Rule 62-110.106 (7)(a)1, Reliant Energy published a notification in the *Orlando Sentinel* on November 19, 1999. Enclosed you will find a copy of the published notice and the corresponding publisher's affidavit.

Please contact me at 713-945-7167 if you have any questions regarding this matter or require any additional information.

Sincerely,

Jason M. Goodwin, P.E.
Senior Engineer, Air Resources Division
Environmental Department
Wholesale Group

JMG:\Power Projects\Osceola\Public Notice Submittal.doc
Encl.

c: Mr. Al Linero – Florida DEP – Tallahassee, FL
Mr. Joe Wellborn – Seminole Electric Cooperative – Tampa, FL
(all w/ encl.)

cc: M. Halpin
CO
EPA
NPS

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BUREAU OF AIR REGULATION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

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Mr. A. A. Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: Custom Fuel Monitoring Schedule Proposed for Reliant Energy Osceola located in Osceola County, Florida

Dear Mr. Linero:

This letter is in response to your November 8, 1999, request for approval of a custom fuel monitoring schedule for Reliant Energy. Reliant will operate three natural gas-fired simple cycle combustion turbines subject to 40 C.F.R. Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines. As requested, Specific Conditions 41, 42, 43, 45 and 46 have been reviewed. The Environmental Protection Agency (EPA) Region 4 has concluded that the use of acid rain nitrogen oxides (NO_x) continuous emission monitoring system (CEMS) for demonstrating compliance, as described in Specific Conditions 41, 42 and 43, is acceptable. Region 4 has also concluded that the natural gas custom fuel monitoring schedule proposed in Specific Condition 45 and the fuel oil monitoring schedule described in Specific Condition 46 are both acceptable.

According to 40 C.F.R. 60.334(b)(2), owners and operators of stationary gas turbines subject to Subpart GG are required to monitor fuel nitrogen and sulfur content on a daily basis if a company does not have intermediate bulk storage for its fuel. 40 C.F.R. 60.334(b)(2) also contains provisions allowing owners and operators of turbines that do not have intermediate bulk storage for their fuel to request approval of custom fuel monitoring schedules that require less frequent monitoring of fuel nitrogen and sulfur content.

Region 4 reviewed Specific Condition 45 which allows SO₂ emissions to be quantified using procedures in 40 C.F.R. 75 Appendix D in lieu of daily sampling as required by 40 C.F.R. 60.334(b). Since the specific limitations listed in the permit condition are consistent with previous determinations, we have concluded that the use of this custom fuel monitoring schedule is acceptable.

Specific Conditions 41, 42 and 43 involve the method used to monitor NO_x excess emissions. Under the provisions for 40 C.F.R. 60.334(c)(1), the operating parameters used to

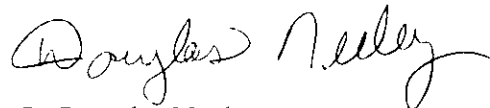
identify NO_x excess emissions for Subpart GG turbines are water-to-fuel injection rates and fuel nitrogen content. As an alternative to monitoring NO_x excess emissions using these parameters, Reliant is proposing to use a NO_x CEMS that is certified for measuring NO_x emissions under 40 C.F.R. Part 75. Based upon a determination issued by EPA on March 12, 1993, NO_x CEMS can be used to monitor excess emissions from Subpart GG turbines if a number of conditions specified in the determination are met and included in the permit condition.

Specific Condition 41 addresses the potential for correcting results to ISO standard day conditions. The basis for this requirement is that, under the provisions of 40 C.F.R. 60.335(c), NO_x results from performance tests must be converted to ISO standard day conditions. As an alternative to continuously correcting results to ISO standard day conditions, Reliant plans to keep records of the data needed to make this conversion, so that NO_x results could be calculated on an ISO standard day condition basis anytime at the request of EPA or the Florida DEP. This approach is acceptable, since the construction permit contains NO_x limits that are more stringent than those in Subpart GG, and compliance with Subpart GG for these units would be a concern only in cases when a turbine is in violation of the NO_x limits in its permit.

Finally, Specific Condition 46 addresses the monitoring schedule for fuel oil. According to 40 C.F.R. 60.334(b)(1), the nitrogen and sulfur content of the fuel oil must be monitored each time a new shipment of fuel oil is transferred to bulk storage. Reliant is proposing to use the fuel analysis provided by the fuel vendor instead of sampling each shipment directly. Provided that all the oil received at the plant complies with the applicable sulfur content limit of 0.8 weight percent, this approach is acceptable, since the specific condition states that the fuel vendor's analyses will comply with the test method requirements of 40 C.F.R. 60.335(d).

If you have any questions about the determination provided in this letter, please contact Ms. Katy R. Forney of the EPA Region 4 staff at (404) 562-9130.

Sincerely,



R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: M. Halpin
CD
NPS