

ERM NC, PC

7300 Carmel Executive Park
Suite 200
Charlotte, NC 28226
(704) 541-8345
(704) 541-8416 (Fax)

RECEIVED

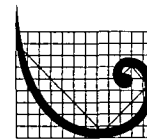
JUN 25 2002

June 19, 2002

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Subject: Response to Request for Additional Information
Regarding Title V Permit Application
DEP File No. 0970071-004-AV
Reliant Energy Osceola, L.L.C., Osceola County



ERM

Dear Mr. Sheplak:

In response to the subject request for information dated May 30, 2002, the intent of the permit application was to include the third combustion turbine in the Title V permit. In order to achieve this goal, a revised compliance plan is enclosed.

A recent development on Units 1 and 2 was the discovery that the sample probes for the units' CEMs had not remained in the required position in the stack. Consequently, the EPA recommended that the CEMs for these units not be certified. Recertification of these CEMs is currently underway and is included in the facility compliance plan.

The compliance plan follows the format recommended by the Department's Mr. Edward Svec. A schedule of compliance item has been added to clarify what will be done and when.

Please do not hesitate to call me at 704-971-2987 or email at steve.alexander@erm.com if you have any further questions about the compliance plan. You can also reach Tim McKenzie at (814)-533-8670.

Sincerely,

A handwritten signature in black ink, appearing to read "S. L. Alexander".

Stephen L. Alexander, P.E.

cc: T. McKenzie, Reliant
T. Gish, Reliant



COMPLIANCE REPORT AND PLAN

Title V Permit Application Holopaw Peaking Units Reliant Energy Osceola, LLC June 19, 2002

Reliant Energy Osceola, LLC (Reliant Energy) completed initial CEM certification testing and filed CEM certification applications for Units 1 and 2 in January 2002. Due to the subsequent discovery of failed CEMS stack probes, Reliant Energy is currently in the process of recertifying the CEMS on Units 1 and 2. The permittee will submit the Acid Rain 40 CFR Part 75 CEM recertification application for Units 1 and 2 within 45 days of test completion for each of these two units.

Within the time periods specified in Table 1, the facility and emissions units identified in this application will be in compliance with the applicable regulations identified in this application form. Compliance with the conditions set forth in this operation permit will be certified on an annual basis by the submittal of the Statement of Compliance - Title V Source DEP Form No. 62-213.900(7). This report will be submitted by March 1 of each year for the prior calendar year.

Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate, but no later than 180 days of initial operation of the facility, and annually thereafter as indicated in the construction permit.

Permittee will submit a properly signed and sealed certification from the permittee's Professional Engineer stating that 1) the construction of the facility was completed in accordance with the construction permit and 2) the facility's emissions units have been tested and compliance with the terms and conditions contained within the construction permit has been demonstrated within 45 days after completion of all of the initial performance tests. [Rules 62-212.400(7)(b), 62-213.440(2), and 62-213.420(1)(a)2[F.A.C.]

Based on Rule 62-213.420(1)(a)2., FAC and the Department's interpretation, the submittal of Reliant Energy's entire Title V application (including the Acid Rain application) is considered timely.

CEM RECERTIFICATION APPLICATION FOR UNIT 1

Recertification field testing for this unit was performed from about 6/9/02 to 6/21/02. Field data is being processed and the CEM recertification application will be submitted to the FDEP and EPA, as appropriate, within 45 days of the test completion.

CEM RECERTIFICATION APPLICATION FOR UNIT 2

Recertification field testing for this unit was performed from about 05/23/02 to 6/7/02. Field data is being processed and the CEM recertification application will be submitted to the FDEP and EPA, as appropriate, within 45 days of the test completion.

CEM CERTIFICATION APPLICATION FOR UNIT 3

Recertification field testing for this unit was performed from about 5/17/02 to 5/23/02. Field data is being processed and the CEM certification application will be submitted to the FDEP and EPA, as appropriate, within 45 days of the test completion

COMPLIANCE TEST REPORT FOR UNIT 3

Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate, but not later than 180 days of initial operation of the unit, and annually thereafter as indicated in the air construction permit.

Compliance stack testing for this unit was performed on or about 5/21/02 for natural gas and 5/22/02 for fuel oil combustion. Field data is being processed and the compliance test report will be submitted to the FDEP within 45 days of the test completion.

Construction will be completed and compliance testing will be initiated by July 1, 2002 (expiration of the air construction permit). Authority to construct will not be extended beyond this expiration without further authorization.

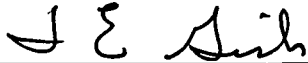
Table 1. Reliant Energy Osceola Compliance Plan

Item	Testing Dates	FDEP Report Submittal Date
UNIT 1 CEM RECERTIFICATION	6/9/02 - 6/21/02	Within 45 days of test completion
UNIT 2 CEM RECERTIFICATION	5/23/02 - 6/7/02	Within 45 days of test completion
UNIT 3 COMPLIANCE TESTS	5/21/02 gas 5/22/02 fuel oil	Within 45 days of test completion
UNIT 3 CEM CERTIFICATION	5/7/02 - 5/23/02	Within 45 days of test completion
CORRECTED EMISSION MONITORING REPORTS FOR UNITS 1 AND 2, 1ST QUARTER 2002	NA	July 15, 2002

COMPLIANCE CERTIFICATION

**Title V Permit Application
Holopaw Peaking Units
Reliant Energy Osceola, LLC**

"I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete."



Terry E. Gish
Managing Director, SE Operations

6-24-02

Date

June 19, 2002

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Regarding Title V Permit Application
DEP File No. 0970071-004-AV
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Sincerely,

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Holopaw Peaking Units
Reliant Energy Osceola, LLC
June 19, 2002**

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CEM CERTIFICATION APPLICATION FOR UNIT 3

Recertification field testing for this unit was performed from about 5/17/02 to 5/23/02. Field data is being processed and the CEM certification application will be submitted to the FDEP and EPA, as appropriate, within 45 days of the test completion

COMPLIANCE TEST REPORT FOR UNIT 3

Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate, but not later than 180 days of initial operation of the unit, and annually thereafter as indicated in the air construction permit.

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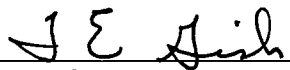
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Holopaw Peaking Units
Reliant Energy Osceola, LLC**

"I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete."



Terry E. Gish
Managing Director, SE Operations

6-24-02
Date



RECEIVED

MAY 17 2004

BUREAU OF AIR REGULATION

7800 South U.S. Highway 1
Titusville, FL 32780

Certified Mail – Return Receipt Requested
No. 7002 2410 0006 5072 3308

April 29, 2004

Mr. Tom Cascio
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of
Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

*AIRMS
UPDATES
5-19-04*

RE: Reliant Energy Indian River
Permit No. 0090196-001-AV
Facility ID No. 0090196
E.U. ID Numbers 001, 002, and 003

Dear Mr. Cascio:

Attached is FDEP Form No. 62-213.900(8), Responsible Official Notification Form, designating a new Responsible Official for Reliant Energy Indian River.

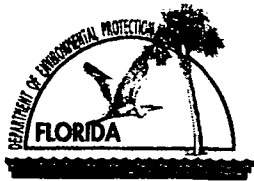
If you have any questions, please contact Amy Deese at (321) 264-4589.

Sincerely,

Terry E. Gish
Managing Director, SE Operations

Attachment

CC: Garry Kuberski, FDEP Central District
Craig Eckberg, Reliant Energy
Joe Araiza, Reliant Energy
Tim McKenzie, Reliant Energy
Vince Brisini, Reliant Energy



Department of Environmental Protection

RECEIVED

MAY 17 2004

Division of Air Resource Management BUREAU OF AIR REGULATION RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Reliant Energy Indian River, LLC	
2. Site Name: Reliant Energy Indian River	3. County: Brevard
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0090196-001-AV	

Notification Type (Check one or more)

- INITIAL:** Notification of responsible officials for an initial Title V application.
- RENEWAL:** Notification of responsible officials for a renewal Title V application.
- CHANGE:** Notification of change in responsible official(s).
- Effective date of change in responsible official(s) April 29, 2004

Primary Responsible Official

1. Name and Position Title of Responsible Official: Terry E. Gish, Managing Director, Southeast Operations
2. Responsible Official Mailing Address: Organization/Firm: Reliant Energy Indian River, LLC Street Address: 7800 South US Highway 1 City: Titusville State: FL Zip Code: 32780
3. Responsible Official Telephone Numbers: Telephone: (321)267-2155 Fax: (321) 385-4685
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.

Jerry E. Smith

Signature

4-29-04

Date

Additional Responsible Official

1. Name and Position Title of Responsible Official: W. Fred McGuire, P.E., Vice President Environmental, Safety, & Health
2. Responsible Official Mailing Address: Organization/Firm: Reliant Energy, Inc. Street Address: P.O. Box 4567 City: Houston State: TX Zip Code: 77251-4567
3. Responsible Official Telephone Numbers: Telephone: (713) 488-8331 Fax: (713) 488-7697
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.