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August 16, 2012

Electronic and Overnight Mail

Mr. Yousry (Joe) Attalla, Engineering Specialist II
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road
MS #5505
Tallahassee, Florida 32399-2400

RECEIVED

AUG 17 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

Re: ***Comments on GenOn Florida, LP, Osceola Power Plant Draft/Proposed Title V Operating Permit No. 0970071-012-AV***

Dear Mr. Attalla:

Thank you for the opportunity to comment on the draft Title V operating permit for Osceola Generation Station, Draft/Proposed Permit No. 0970071-012-AV. This letter serves as the comments of GenOn Florida, LP with regard to the draft permit.

1. Facility Name

The cover page and footer of subsequent pages refer to 'Osceola **Generation Station**'. Previous permits and the renewal application for this action give the name of the facility as 'Osceola **Power Plant**'. For consistency with previous permits, the permit application and GenOn's internal naming practice, please change the facility name in the permit to **Osceola Power Plant**.

2. Emissions Units 001, 002, and 003: Condition A.9

Permit Condition:

Volatile Organic Compounds (VOC) Emissions. As determined by stack tests, the maximum emission limit for VOC at ISO conditions from each combustion turbine shall not exceed:

- a. *While firing natural gas:* 1.5 ppmvd and 3.0 lb/hour
- b. *While firing fuel oil:* 3.7 ppmvd and 8.0 lb/hour

Requested Change (emphasis added):

Volatile Organic Compounds (VOC) Emissions. As determined by **initial** stack tests, the maximum emission limit for VOC at ISO conditions from each combustion turbine shall not exceed:

- a. *While firing natural gas:* 1.5 ppmvd and 3.0 lb/hour
- b. *While firing fuel oil:* 3.7 ppmvd and 8.0 lb/hour

The initial stack test has been completed.

Justification:

Adding the suggested language provides clarity that the requirement for VOC testing has been met. The added language is consistent with the recently expired Title V Operating Permit, No. 0970071-010-AV, Condition A.8.

3. Emissions Units 001, 002, and 003: Condition A.18The permit condition states, in part, emphasis added:

“...A valid hourly emission rate shall be calculated for each hour in which at least two NOx concentrations are obtained at least 15 minutes apart...”

Requested Change:

For the above listed sentence:

“A valid hourly emission rate shall be calculated for each hour in **accordance with 40 CFR §75.10.**”

Justification: Harmonizing permit condition A.18 with Part 75 data validation allows for one Federally and State enforceable method of data validation. As written, it is possible that single hours would need to undergo two data validation processes as Emission Units 001, 002, and 003 are subject to monitoring in accordance with applicable provisions of 40 CFR Part 75.

4. Emission Units 006 and 007: Condition B.3The permit condition states in part:

- a. *Oil:* Change oil and filter every 500 hours of operation or annually, whichever comes first. [40 CFR 63 Table 2d(4)]
- b. *Air Cleaner:* Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. [40 CFR 63 Table 2d(4)]
- c. *Hoses and Belts:* Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63 Table 2d(4)]

Requested Change:

- a. *Oil:* Change oil and filter every 500 hours of operation or annually, whichever comes first. [40 CFR 63 **Subpart ZZZZ** Table 2d(4)]
- b. *Air Cleaner:* Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. [40 CFR 63 **Subpart ZZZZ** Table 2d(4)]
- c. *Hoses and Belts:* Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63 **Subpart ZZZZ** Table 2d(4)]

Justification:

As written, the references are not specific. Adding the Subpart points directly to the underlying NESHAP requirements.

GenOn appreciates the Department's consideration to our requested changes, and we are looking forward to receiving the renewed operating permit. Please contact me via telephone or email listed above or Cathie Loudenslager at Cathie.Loudenslager@Genon.com or 321-289-7384 with any questions concerning these requested changes.

Sincerely,



Sharene D. Shealey
Manager, Air Operations & Compliance