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BUREAU OF AIR REGULATION

MIRANT™

September 3, 2003

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

Re: Comments on DRAFT Permit Revision No. 1010373-004-AV  
Shady Hills Generating Station  
Facility ID No. 1010373

Dear Mr. Sheplak:

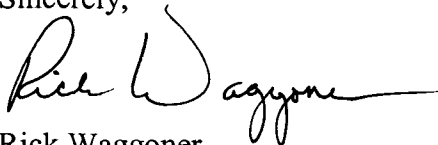
Shady Hills Generating Station requests the removal of the fuel oil supplier nitrogen analysis requirement from General Condition A.39 with the revision to read as follows:

**A.39. Fuel Oil Monitoring Schedule.** The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analysis was conducted and shall comply with the requirements of 40 CFR 60.335(d).  
[1010373-001-AC, Specific Condition 45.]

A demonstration of fuel bound nitrogen serves little purpose when NO<sub>x</sub> emissions are continuously monitored and reported as required by 40 CFR 75. Unlike continuous emissions monitoring for NO<sub>x</sub>, sulfur content of the fuel is required to determine SO<sub>2</sub> emissions in accordance with 40 CFR 75. The 40 CFR 60.334(b) requirement to monitor nitrogen content of the fuel being fired was more appropriate when NO<sub>x</sub> emissions were determined by continuously monitoring the ratio of water-to-fuel being fired in the turbine in lieu of continuous analysis of the stack gases for NO<sub>x</sub> emissions.

Thanks for your consideration of this request. If you have any questions or require additional information, please do not hesitate to call me at 817/732-6900.

Sincerely,



Rick Waggoner  
Mirant Mid - Continent Environmental, Safety and Health Manager  
Alternate Designated Representative

cc: Jimmy Packer – Mirant  
Bruce Lobach – Shady Hills Generating Station