



P.O. Box 4567
Houston, TX 77210-4567
713 207 3000

RECEIVED

OCT 16 2000

BUREAU OF AIR REGULATION

October 6, 2000

Mr. Michael P. Halpin, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Stop 5505

**Subject: Reliant Energy Osceola – Permit No. PSD-FL-273
File No. 0970071-001-AC
Notification of Start of Construction**

Dear Mr. Halpin:

As required by 40 CFR 60.7 (a)(1) of the New Source Performance Standards (NSPS), Reliant Energy Osceola, L.L.C. (Reliant Energy) is required to submit notification to the Florida Department of Environmental Protection (DEP) and the U.S. Environmental Protection Agency (EPA) within 30 days that construction has begun. Construction activities for the Reliant Energy Osceola electric generating facility began on Tuesday, October 3, 2000.

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

Sincerely,

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

JMG:\Power Projects\Osceola\Start of Construction.doc

c: Mr. Winston Smith - Air, Pesticides and Toxics Management Division, U.S. EPA Region 4 – Atlanta
Mr. Leonard Kozlov – Central Region, Florida DEP - Orlando



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

February 17, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. Christopher Allen
Reliant Energy Osceola, L.L.C.
P.O. Box 4455
Houston, Texas 77210-4455

Re: DEP File No. 0970071-001-AC (PSD-FL-273)
Osceola Power Project
Three Simple Cycle Combustion Turbines

Dear Mr. Allen:

The Department reviewed your request dated February 7, 2000 to correct the number of fuel oil storage tanks allowed for in the construction permit No. PSD-FL-273, Osceola Power Project to be located at Holopaw, Osceola County. This correction allows for the construction of two fuel oil storage tanks with a capacity of 1.5 million gallons each, rather than one fuel oil storage tank with a 3 million-gallon capacity. As indicated by your submittals, this was included within your final site configuration change and this correction is issued as a minor, administrative change. The Department hereby authorizes this change and has attached the pertinent (corrected) pages of the permit.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

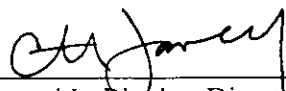
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of

any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.


to _____
Howard L. Rhodes, Director
Division of Air Resources
Management

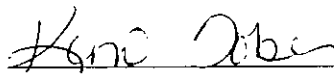
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2-22-00 to the person(s) listed:

J. Christopher Allen, Reliant*
Gregg Worley, EPA
John Bunyak, NPS
Len Kozlov, DEP CD
Chair, Osceola County BCC
Donald Schultz, P.E., Black & Veatch

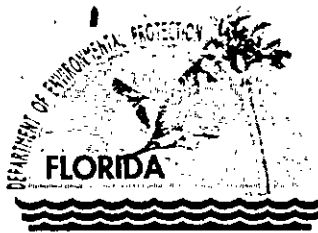
Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

2-23-00
(Date)



Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

Jeb Bush
Governor

PERMITTEE:

Reliant Energy Osceola, L.L.C.
P.O. Box 4455
Houston, Texas 77210-4455

File No.	PSD-FL-273
FID No.	0970071
SIC No.	4911
Expires:	July 1, 2002
Corrected:	February 17, 2000

Authorized Representative:

J. Christopher Allen

PROJECT AND LOCATION:

Air Construction Permit pursuant to the requirements for the Prevention of Significant Deterioration of Air Quality Permit for: three dual-fuel nominal 170 megawatt (MW) General Electric PG7241FA combustion turbine-electrical generators; two 1.5-million gallon fuel oil storage tanks; and three 75-foot stacks. The units will operate in simple cycle mode and intermittent duty. The units will be equipped with Dry Low NO_x (DLN-2.6) combustors and wet injection capability.

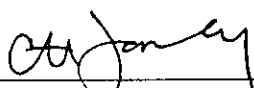
The project will be located on the south edge of a local road, approximately 7,000 feet west of U.S. 441. The local road intersects U.S. 441 approximately 5,000 feet south of the intersection of U.S. 192 and U.S. 441, Osceola County. UTM coordinates are: Zone 17; 490.429 km E; 3111.307 km N.

STATEMENT OF BASIS:

This Air Construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendices and Tables made a part of this permit:

- Appendix BD BACT Determination
- Appendix GC Construction Permit General Conditions


for _____
Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT PSD-FL-273 (0970071-001-AC)

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

This facility is a new site. This permitting action is to install three dual-fuel nominal 170 megawatt (MW) General Electric PG7241FA combustion turbine-electrical generators with three 75-foot stacks and two 1.5-million gallon fuel oil storage tanks. Additionally a gas pipeline heater and a diesel fire pump are authorized for installation. Emissions from the new CT's will be controlled by Dry Low NO_x (DLN-2.6) combustors when operating on natural gas and wet injection when firing fuel oil. Inherently clean fuels and good combustion practices will be employed to control all pollutants.

EMISSION UNITS

This permit addresses the following emission units:

ARMS EMISSIONS UNIT	SYSTEM	EMISSION UNIT DESCRIPTION
001	Power Generation	One nominal 170 Megawatt Gas Simple Cycle Combustion Turbine-Electrical Generator
002	Power Generation	One nominal 170 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
003	Power Generation	One nominal 170 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
004	Fuel Storage	Two 1.5 Million Gallon Fuel Oil Storage Tanks

REGULATORY CLASSIFICATION

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Pursuant to Table 62-212.400-2, modifications at this facility resulting in emissions increases greater than any of the following values require review per the PSD rules as well as a determination of Best Available Control Technology (BACT): 40 TPY of NO_x, SO₂, or VOC; 25/15 TPY of PM/PM₁₀; 100 TPY of CO; or 7 TPY of sulfuric acid mist (SAM). This facility and the project are also subject to applicable provisions of Title IV, Acid Rain, of the Clean Air Act.

AIR CONSTRUCTION PERMIT PSD-FL-273 (0970071-001-AC)

SECTION I. FACILITY INFORMATION

PERMIT SCHEDULE

- 11/19/99 Notice of Intent published in The Orlando Sentinel
- 11/01/99 Distributed Intent to Issue Permit
- 10/29/99 Application deemed complete
- 08/03/99 Received Application

RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on August 3, 1999
- Applicant's response dated October 6, 1999 to Department Request dated August 25, 1999
- Applicant's e-mail dated October 20, 1999
- Applicant's additional submittal dated October 28, 1999
- Department's Intent to Issue and Public Notice Package dated November 8, 1999
- Department's Final Determination and Best Available Control Technology Determination issued concurrently with this permit.
- Applicant's request for Administrative Change, received February 10, 2000 providing for 2 each 1.5-million gallon fuel oil storage tanks rather than 1 each 3-million gallon tank

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

APPLICABLE STANDARDS AND REGULATIONS:

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 60, 72, 73, and 75.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
3. These emission units shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions including:
 - 40CFR60.7, Notification and Recordkeeping
 - 40CFR60.8, Performance Tests
 - 40CFR60.11, Compliance with Standards and Maintenance Requirements
 - 40CFR60.12, Circumvention
 - 40CFR60.13, Monitoring Requirements
 - 40CFR60.19, General Notification and Reporting requirements
4. ARMS Emission Units 001-003, Power Generation, consisting of three 170 megawatt combustion turbines (with evaporative coolers) shall comply with all applicable provisions of 40CFR60, Subpart GG, Standards of performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies. However, such correction is not used for compliance determinations with the BACT standard(s). [Rule 62-204.800(7)(b), F.A.C.]
5. ARMS Emission Unit 004, Fuel Storage, consisting of two 1.5 million gallon distillate fuel oil storage tanks shall comply with all applicable provisions of 40CFR60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-204.800(7)(b), F.A.C.]
6. All notifications and reports required by the above specific conditions shall be submitted to the DEP's Central District.

GENERAL OPERATION REQUIREMENTS

7. Fuels: Only pipeline natural gas or maximum 0.05 percent sulfur fuel oil No. 2 or superior grade of distillate fuel oil shall be fired in these units. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)] {Note: The limitation of this specific condition is more stringent than the NSPS sulfur dioxide limitation and thus assures compliance with 40 CFR 60.333 and 60.334}

Florida Department of
Environmental Protection

Memorandum

DS 10290
2-18

TO: Howard L. Rhodes

THRU: Clair Fancy
Al Linero *CLF* 2/16

FROM: Mike Halpin *MH*

DATE: February 14, 2000

SUBJECT: Reliant Energy Osceola, L.L.C. Corrected PSD Permit

Attached for approval and signature are four pertinent pages related to a previously issued air construction permit for the subject (new) facility. A copy of the applicant's request is also attached.

The original application incorporated one 3-million gallon fuel oil storage tank. As indicated in the applicant's submittal, a late change to the facility layout during the public comment period (which I understand was prompted by a local desire to minimize noise) caused the applicant's final engineering design to utilize two tanks of 1.5-million gallons each.

I recommend your approval and signature.

Attachments

/mph



PO Box 4567
Houston, Texas 77210-4567
Phone 281 233 2300

RECEIVED

FEB 10 2000

BUREAU OF AIR REGULATION

February 7, 2000

Mr. Michael P. Halpin, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Stop 5505

**Subject: Reliant Energy Osceola – Permit No. PSD-FL-273 / File No. 0970071-001-AC
Request for Administrative Change**

Dear Mr. Halpin:

Reliant Energy Osceola, L.L.C. (Reliant Energy) was recently issued a Prevention of Significant Deterioration (PSD) Permit by the Florida Department of Environmental Protection (FDEP) authorizing construction and operation of the Osceola Power Project (Osceola), which is to be located near Holopaw, Florida. As we discussed by telephone recently, the final PSD permit for Osceola contained an error that was not identified prior to its issuance on December 28, 1999. The purpose of this correspondence is to request an administrative change to Permit No. PSD-FL-273 such that the permit conditions are consistent with Reliant Energy's construction plan for the Osceola facility.

You will recall that, due to potential noise impacts, Reliant Energy revised the proposed location of the Osceola facility by moving it approximately 5,000 feet to the south-southwest with respect to its previously planned location. As noted in correspondence to your office dated December 15, 1999, Reliant Energy performed an air dispersion modeling analysis on this new location and site configuration, and submitted a report to FDEP verifying that ambient impacts from emissions of all PSD pollutants would remain below the applicable significant impact levels.

Along with the revised project site location, Reliant Energy also revised the plant site layout to eliminate the single 3.0 million gallon fuel oil storage tank, which was part of the original facility plan. The final version of the facility plan, which was used as the basis for the final air modeling analysis, featured two fuel oil storage tanks with a capacity of 1.5 million gallons each. Accordingly, Reliant Energy is requesting that Permit No. PSD-FL-273 be modified to reflect the intent to construct two fuel oil storage tanks with a maximum storage capacity of 1.5 million gallons each, in lieu of the currently authorized single 3.0 million gallon-capacity fuel oil storage tank.

Please contact me at 713-945-7167 if you have any questions concerning this permit application.

Sincerely,

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

JMG:\Power Projects\Osceola\FOST Revision.doc

c: Al Linero – Florida DEP – Tallahassee, FL

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional service.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Christopher Allen
 Reliant Energy Oceda
 PO Box 4455
 Houston, TX
 77210-4455

4a. Article Number

Z 031 391 867

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

FEB 24 2000

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X

GEE

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

Z 031 391 867

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to		Christopher Allen
Street & Number		Reliant Energy
Post Office, State, & ZIP Code		Houston TX
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date		2-22-00
		097CC 71-001 AC
		PSD-F1-273

PS Form 3800, April 1995



P.O. Box 4567
Houston, Texas 77210-4567
Phone 281 287 2000

RECEIVED

FEB 10 2000

BUREAU OF AIR REGULATION

February 7, 2000

Mr. Michael P. Halpin, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Stop 5505

**Subject: Reliant Energy Osceola – Permit No. PSD-FL-273 / File No. 0970071-001-AC
Request for Administrative Change**

Dear Mr. Halpin:

Reliant Energy Osceola, L.L.C. (Reliant Energy) was recently issued a Prevention of Significant Deterioration (PSD) Permit by the Florida Department of Environmental Protection (FDEP) authorizing construction and operation of the Osceola Power Project (Osceola), which is to be located near Holopaw, Florida. As we discussed by telephone recently, the final PSD permit for Osceola contained an error that was not identified prior to its issuance on December 28, 1999. The purpose of this correspondence is to request an administrative change to Permit No. PSD-FL-273 such that the permit conditions are consistent with Reliant Energy's construction plan for the Osceola facility.

You will recall that, due to potential noise impacts, Reliant Energy revised the proposed location of the Osceola facility by moving it approximately 5,000 feet to the south-southwest with respect to its previously planned location. As noted in correspondence to your office dated December 15, 1999, Reliant Energy performed an air dispersion modeling analysis on this new location and site configuration, and submitted a report to FDEP verifying that ambient impacts from emissions of all PSD pollutants would remain below the applicable significant impact levels.

Along with the revised project site location, Reliant Energy also revised the plant site layout to eliminate the single 3.0 million gallon fuel oil storage tank, which was part of the original facility plan. The final version of the facility plan, which was used as the basis for the final air modeling analysis, featured two fuel oil storage tanks with a capacity of 1.5 million gallons each. Accordingly, Reliant Energy is requesting that Permit No. PSD-FL-273 be modified to reflect the intent to construct two fuel oil storage tanks with a maximum storage capacity of 1.5 million gallons each, in lieu of the currently authorized single 3.0 million gallon-capacity fuel oil storage tank.

Please contact me at 713-945-7167 if you have any questions concerning this permit application.

Sincerely,

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


JMG:\Power Projects\Osceola\FOST Revision.doc


c: Al Linero – Florida DEP – Tallahassee, FL

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy
~~Al Linero~~ 

FROM: Mike Halpin 

DATE: December 21, 1999

SUBJECT: Reliant Energy Osceola, L.L.C. PSD Permit

Attached for approval and signature is an air construction permit for the subject (new) facility. The Public Notice requirements have been met on November 19, 1999 by publishing in the Orlando Sentinel.

Comments were received by the US EPA, US Fish and Wildlife Service as well as the applicant and are addressed within the Final Determination.

I recommend your approval and signature.

Day 90 is 1/22/99.

Attachments

/mph



P.O. Box 4567
Houston, Texas 77210-4567
Phone: 713 207 3000

December 20, 1999

RECEIVED

DEC 21 1999

BUREAU OF AIR REGULATIO**

Mr. Michael P. Halpin, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Stop 5505

**Subject: Submittal of Professional Engineer Certification for Reliant Energy Osceola
Revised Ambient Air Quality Analysis**

Dear Mr. Halpin:

Reliant Energy Osceola, L.L.C. submitted a revised air quality impact analysis to your office for review on December 15, 1999 in support of a PSD air permit application for the Reliant Energy Osceola facility. As required by Florida DEP regulations, that submittal requires certification by a Florida registered professional engineer. Please find enclosed the required certification statement that pertains to the revised impact analysis.

Please contact me at 713-945-7167 if you have any questions concerning this permit application.

Sincerely,

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

JMG:\Power Projects\Osceola\Model PE Cert - v2.doc
Encl.

c: Al Linero - Florida DEP - Tallahassee, FL
(w/o encl.)

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

O O Schultz

Signature

12/17/99

Date

(seal)

* Attach any exception to certification statement.



P.O. Box 4567
Houston, Texas 77210-4567
Phone: 713 207 3000

December 15, 1999

RECEIVED

DEC 16 1999

Mr. Michael P. Halpin, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Stop 5505

BUREAU OF AIR REGULATION

**Subject: Submittal of Revised Ambient Air Quality Analysis
Reliant Energy Osceola**

Dear Mr. Halpin:

Reliant Energy Osceola, L.L.C. recently submitted a Prevention of Significant Deterioration (PSD) Air Permit Application for the Osceola Power Project, to be located near Holopaw, Florida. As we discussed by telephone recently, the air quality impact analysis (AQIA) for Osceola has been modified to account for changes made to the proposed site layout that resulted from the movement of the plant island approximately 1 mile to the south-southwest of the original location.

The enclosed report discusses the results of the revised AQIA, and the enclosed compact disc includes the electronic files used in the revised analysis. The results of this revised analysis are consistent with the previously submitted analyses and indicate that emissions from the proposed Osceola facility will not exceed the applicable PSD significant impact levels for any regulated pollutant.

Please contact me at 713-945-7167 if you have any questions concerning this permit application.

Sincerely,

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

JMG:\Power Projects\Osceola\Revised Model Trans #3.doc
Encl.

c: Al Linero - Florida DEP - Tallahassee, FL

cc: C. Holladay, BAR
CD
NPS
EPA

Reliant Energy Osceola, L.L.C.

Revised Air Dispersion Modeling Analysis

Recent engineering and design changes to the proposed Reliant Energy Osceola facility have prompted additional air dispersion modeling to be performed for the proposed facility. These changes include a relocation of the entire facility approximately 1 mile south-southwest of the original location as well as modifications to the locations of on-site structures and the fenceline. There were no operational or performance related modifications made to the facility. The changes and their associated impacts were assessed with the Industrial Source Complex (ISCST3 Version 99155) air dispersion model. The methodology of this air dispersion modeling, including specific air dispersion model defaults, terrain, and meteorological data, remain unchanged from the original air dispersion modeling report submitted in the original Construction Permit Application of July 30, 1999, as well as a supplemental dispersion modeling report submitted on October 28, 1999.

The facility was relocated approximately 1 mile south-southwest of the original site of the proposed generating facility. Figure 1 presents the current proposed location of the facility on a USGS topographic map. Figure 2 illustrates the revised nested rectangular grid, fence line receptors and the relative location of the emission sources and downwash structures.

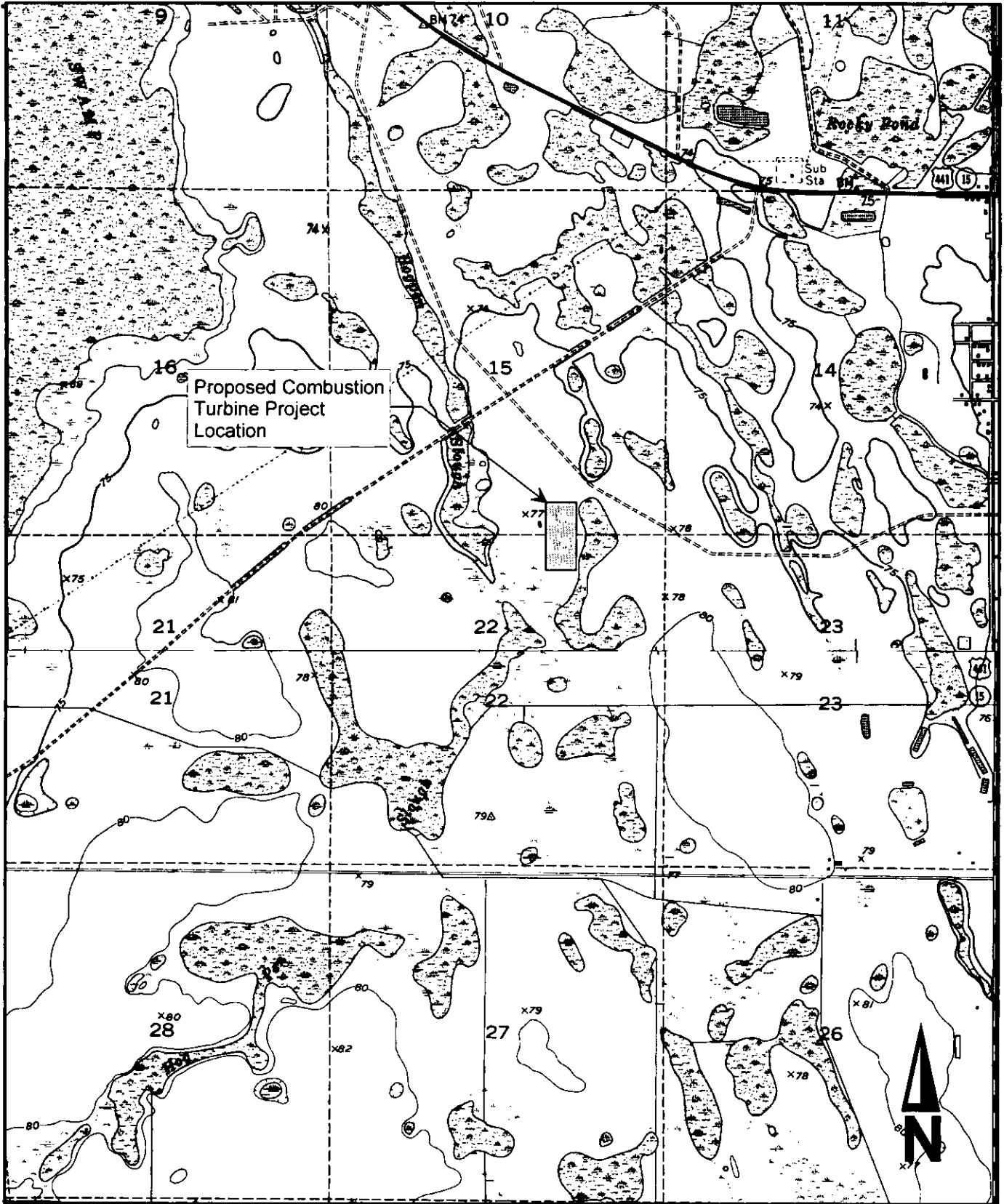
All sources (including the fuel gas heater) and operating scenarios modeled in the two previous air dispersion modeling analyses were again modeled in this new arrangement. Maximum model predicted concentrations for each pollutant and applicable averaging period are presented in Table 1. This table also provides the PSD Class II significant impact levels and required preconstruction monitoring levels. As indicated in Table 1, the facility's maximum predicted concentrations for all pollutants from all sources and modeled operating scenarios are less than the PSD Class II Significant Impact Level (SIL) for each pollutant and applicable averaging period. These results are similar to those found in the previous air dispersion modeling analyses where the maximum

predicted modeled impacts also were less than the respective PSD SILs for all pollutants and applicable averaging periods. The changes to the proposed facility will have an insignificant impact on the environment, and the PSD program requires no further air quality impact analyses. In addition, because the maximum predicted concentrations are all less than the PSD SILs for each pollutant and applicable averaging period and are not significantly greater than the original predicted maximum concentrations, the previously submitted Additional Impacts Analysis and Class I Area Impact Analysis were not updated, and the conclusions of these analyses remain valid.

A copy of the revised input (*.DAT) files and the output (*.LST) files from this updated analysis are included as an attachment.

Table 1 Comparison of Maximum Predicted Impacts with the PSD Class II Significant Impact Levels and the PSD De Minimus Monitoring Levels				
Pollutant	Averaging Period	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	PSD Class II Significant Impact Level	PSD De Minimus Monitoring Level
NO _x	Annual	0.54	1	14
SO ₂	Annual	0.40	1	-
	3-Hour	12.92	25	-
	24-Hour	4.33	5	13
CO	1-Hour	40.71	2,000	-
	8-Hour	22.07	500	575
PM ₁₀	Annual	0.07	1	-
	24-Hour	1.50	5	10

Figure 1
Topographic Site Location

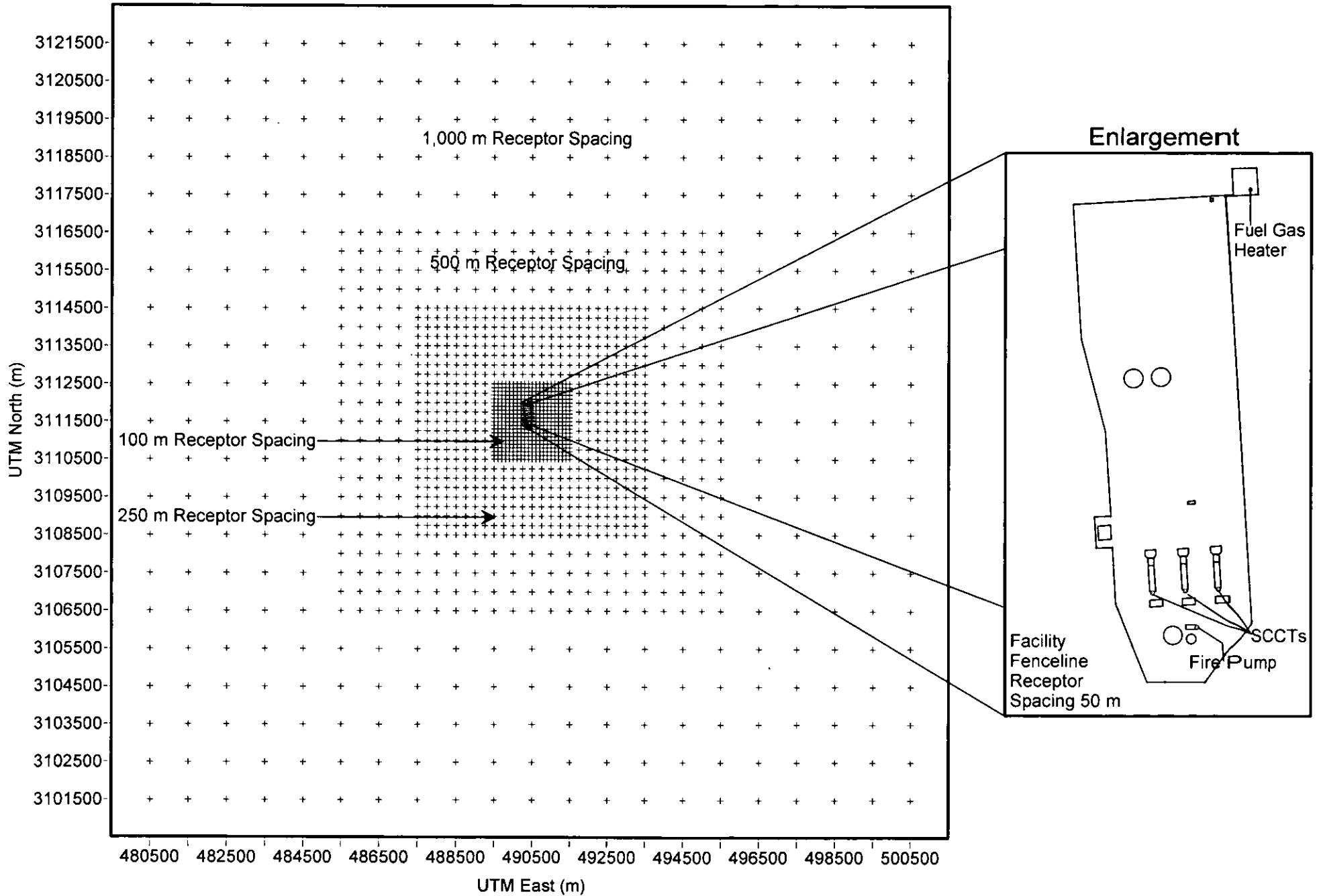


Base Map: 7.5 minute Quadrangles (Holopaw and Holopaw SE, FL)

Reliant Energy Proposed Combustion Turbine Project Location

Figure 1

Figure 2
Receptor Locations and Facility Layout



Receptor Grid and Facility Layout

Figure 2