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April 23, 2009

BUREAU OF ARR REGULATION

Ms. Trina Vielhauer, Chief, Bureau of Air Regulation Florida Department of Environmental Protection Permitting South Section Mail Station #5505 2600 Blair Stone Road Tallahassee, FL 32399-0114

RE: Reliant Energy Florida, LLC - Osceola Power Plant

Facility ID # 0970071

Notification of installation of Emergency Generator in case of power loss

Dear Trina Vielhauer:

Reliant Energy Florida, LLC (Reliant Energy) has had to rent and plans to eventually purchase and install an emergency generator at the Osceola Power Plant for use during power outages to the facility. The station has been experiencing power outages while Progress Energy has been working on a local substation that supports the Osceola Power Plant. The combined use of all diesel fuel burning emergency generators will not exceed 500 operating hours per year, and will not consume more than 32, 000 gallons of diesel fuel per year.

This unit satisfies the definition of an "Emergency Generator" found in paragraph 62-210.200(119), FAC:

(119) Emergency Generator is any stationary generator powered by an internal combustion engine which operates no more than 500 hours per year as a mechanical or electrical power source to provide power internal to a facility only when the primary power source for that facility has been rendered inoperable by an emergency situation.

The installation of this Emergency Generator is exempt from obtaining an air construction permit pursuant to paragraph 62-210.300(3)(a)(35), FAC:

- 35. One (1) or more emergency generators located within a single facility provided:
- a. The unit is not subject to the Acid Rain Program. CAIR program, or any unit-specific applicable requirement.
- b. The unit shall not burn used oil or any fuels other than natural gas, propane, gasoline, and diesel fuel.
- c. Collectively, all units claiming this exemption at the same facility shall not burn more than the collective maximum annual amount of a single fuel, as given in subsubparagraph d., or equivalent collective maximum annual amounts of multiple fuels, as addressed in sub-subparagraph e.

d. If burning only one (1) type of fuel, the collective annual amount of fuel burned by all units claiming this exemption at the same facility shall not exceed 2,700 gallons of gasoline, 32,000 gallons of diesel fuel, 144,000 gallons of propane, or 4,4 million standard cubic feet of natural gas.

e. If burning more than one (1) type of fuel,.... <this section not relevant>the equivalent

This emergency generator was rented from Sunbelt Rental. It is a 1000 KW diesel-fuel burning generator, ENE model #1000KW40150. It is a new heavy-duty off-road equipment engine certified under an executive order (attached) to conform to all applicable California emission regulations and to all applicable terms and conditions of the Settlement Agreement dated January 6, 2000. This particular machine is:

- model year 2000.
- engine family YDDXL31.8VRE (Series 2000),
- Tier 1 Emission standard category:

We understand from a similar request from March 2009 that this generator is exempt from construction permit requirements as long as the operating hours are less than 500 hours per year and diesel fuel use is below 32,000 gallons per year for all of the emergency generators on site. We also understand that the subjection to 40 CFR 60, Subpart IIII is an applicable requirement that must be included in our Title V permit the next time it is opened. Since our facility is not a major source of hazardous air pollutants, it will not also be subject to 40 CFR 63. Subpart ZZZZ. Once included in the Title V permit, as long as the engine continues to satisfy the requirements to maintain the manufacturer's certification, the engine will be treated basically as an insignificant or unregulated emissions unit.

If you require more information, please contact Michelle Duncan at 724-597-8631 or mfduncan@reliant.com. Thank you for your review.

Sincerely,

Larry A. Bigos,

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Operations Manager, Osceola Power Plant

cc: Michelle Duncan
Cathie Loudenslager
Vince Menta
Keith Schmidt