



1001 Broad Street  
P.O. Box 1050  
Johnstown, PA 15907-1050

Writer's Direct Dial Number  
814-533-8037

October 29, 2002

**Via Facsimile and Overnight Mail**

**RECEIVED**

**OCT 30 2002**

**BUREAU OF AIR REGULATION**

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

***Re: Additional Comments on Title V Operating Permit for Osceola Station  
Draft Permit No. 0970071-004-AV, dated 08/26/02***

Dear Mr. Sheplak:

Reliant Energy Osceola, L.L.C. (Reliant Energy) respectfully submits the following additional comments on the Department's draft Title V permit for the Osceola Generating Station, Permit No. 0970071-004-AV, dated 08/26/02.

Condition A.21, on page 13, of Section III sets forth the initial performance testing requirements of the combustion turbines. The condition includes a requirement to conduct testing after any modifications of air pollution control equipment "such as change or tuning of combustors." We object to the inclusion of combustor "tuning" as a trigger for conducting performance testing of the combustion turbines.

Combustor tuning is a necessary procedure and may be required at a regular frequency in order to maintain the units at optimum performance. Requiring performance testing after each tuning of the combustors would impose a substantial and unreasonable burden. Moreover, we understand that the Department's recently issued air construction permits have not required performance tests after combustor tuning and, instead, have recognized tuning in accordance with manufacturer's recommendations. Thus, consistent with the language of these recently issued permits, we request the following alternative wording for Condition A.21:

All performance tests required for initial start-up shall also be required after any substantial modifications (and shakedown period not to exceed 100 days after re-starting the CT) of air pollution control equipment such as a change of combustors.

Mr. Scott M. Sheplak  
October 29, 2002  
Page 2


In addition, we request a revision of Condition A.5 on page 8 to the following (additional text is underscored):

Dry Low NO<sub>x</sub> (DLN-2.6) combustors shall be installed on the stationary combustion turbine to control nitrogen oxides (NO<sub>x</sub>) emissions while firing natural gas. The system shall be tuned in accordance with the manufacturer's recommendations. The permittee shall provide at least five days advance notice prior to any tuning session.

These recommended revisions will allow Reliant Energy the flexibility to operate the turbines in a manner consistent with the manufacturer's recommendations and in accordance with good engineering practices while maintaining compliance with the specific pollutant emissions rates outlined in the operating permit. The revisions will not compromise the Department's ability to enforce and implement the conditions of the operating permit.

We appreciate the Department's consideration of these comments. If you have any questions, please contact either Amy Deese at 321-264-4589 or Timothy E. McKenzie at 814-533-8670.

Sincerely,



Vincent J. Brisini  
Environmental Manager

VJB/cms/TEM428R

Attachment

cc: T. E. McKenzie (w/attach)  
A. H. Deese (w/attach)



1001 Broad Street  
P.O. Box 1050  
Johnstown, PA 15907-1050

Writer's Direct Dial Number  
814-533-8670

October 9, 2002

**Via Overnight Mail**

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

RECEIVED

OCT 10 2002

BUREAU OF AIR REGULATION

**Re: *Proof of Publication "Public Notice Of Intent To Issue Title V Air Operating Permit" Reliant Energy Osceola, LLC Draft Permit No. 0970071-004-AV***

Dear Mr. Sheplak:

Reliant Energy Osceola, L.L.C. (Reliant Energy) respectfully submits the Proof of Publication, "Public Notice Of Intent To Issue Title V Air Operating Permit." The Public Notice was published in the Orlando Sentinel on September 30, 2002.

If you have any questions concerning this Proof of Publication, please contact either me.

Sincerely,

Timothy E. McKenzie  
Senior Environmental Scientist

TEM/cms/TEM417R

Attachment

State of Florida } S.S.  
COUNTY OF ORANGE }

BEVERLY C. SIMMONS

BUREAU OF AIR REGULATION

OCT 10 2002

RECEIVED

Before the undersigned authority personally appeared \_\_\_\_\_, who on oath says that he/she is the Legal Advertising Representative of Orlando Sentinel, a daily newspaper published at ORLANDO in ORANGE County, Florida; that the attached copy of advertisement, being a PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT in the matter of 0970071-004-AV in the ORANGE Court, was published in said newspaper in the issue; of 09/30/02

Affiant further says that the said Orlando Sentinel is a newspaper published at ORLANDO in said ORANGE County, Florida, and that the said newspaper has heretofore been continuously published in said ORANGE County, Florida, each Week Day and has been entered as second-class mail matter at the post office in ORLANDO in said ORANGE County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

The foregoing instrument was acknowledged before me this 1st day of OCTOBER, 20 02, by BEVERLY C. SIMMONS, who is personally known to me and who did take an oath.

(SEAL)

OFFICIAL NOTARY SEAL  
JULIA NICHOLS  
NOTARY PUBLIC STATE OF FLORIDA  
COMMISSION NO. DD054311  
MY COMMISSION EXP. SEPT 23, 2005

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DRAFT Permit No.: 0970071-004-AV  
Reliant Energy Osceola, L.L.C.  
Osceola County.

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit to Reliant Energy Osceola, L.L.C. for the Reliant Energy Osceola facility, located at 5200 West Halopaw Road, St. Cloud, Osceola County. The applicant's name and address are: Mr. T. E. Sh. Managing Director, Southeast Operations, Reliant Energy Osceola, L.L.C., 7800 South U.S. Highway 1, Titusville, Florida 32780.

The permitting authority will issue the PROPOSED Permit and subsequent FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office at Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another public notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Section 120.569 and 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however any person who asked the permitting authority 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 applicable 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 the 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 201.06, 205.

A complete project file is available for public inspection during normal business hours 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays at:  
Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 403  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979  
Affected District and/or Local Program:  
Department of Environmental Protection  
Central District Office  
3319 Magnolia Boulevard, Suite 232  
Orlando, Florida 32803-3767  
Telephone: 407/894-7533  
Fax: 407/897-5963

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information. COR 4687541 SEPT 30, 2002

Florida Administrative Code (F.A.C.)

A petition that disputes the material facts on which the permitting authority'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, 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 petitioner's substantial rights will be affected by the agency determination;  
(c) A statement of how and when the 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 state;  
(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;  
(f) A statement of the specific rules or statutes the petitioner contends, require reversal or modification of the agency's proposed action; and

of such petition, the petitioner, stating precisely the action to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the petitioner's final action may be different from the action taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority 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 for this proceeding. In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 761d(b)(2) any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 761d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 42-23, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 761d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M. Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays at:

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 403  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979  
Affected District and/or Local Program:  
Department of Environmental Protection  
Central District Office  
3319 Magnolia Boulevard, Suite 232  
Orlando, Florida 32803-3767  
Telephone: 407/894-7533  
Fax: 407/897-5963

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information. COR 4687541 SEPT 30, 2002



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Writer's Direct Dial Number  
814-533-8037

October 1, 2002

**OVERNIGHT MAIL**

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

**RECEIVED**

OCT 02 2002

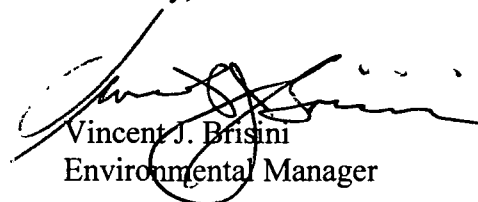
BUREAU OF AIR REGULATION

***Re: Comments on Title V Operating Permit for Osceola Station  
Draft Permit No. 0970071-004-AV, dated 08/26/02***

Reliant Energy Osceola, L.L.C. (Reliant Energy) respectfully submits the following comments on the Department's draft Title V permit for the Osceola Generating Station, Permit No. 0970071-004-AV, dated 08/26/02. We appreciate the opportunity to comment on the draft Title V permit and value the excellent working relationship we have with the Department. The subject comments can be found on the attached pages.

We appreciate the Department's consideration of these comments. If you have any questions, please contact either Amy Deese at 321-264-4589 or Timothy E. McKenzie at 814-533-8670.

Sincerely,

  
Vincent J. Brisini  
Environmental Manager

VJB/cms/TEM414R

Attachment

cc: T. E. McKenzie (w/ attach)  
A.H. Deese (w/attach)

## Reliant Energy Comments on Draft Osceola Station Title V Operating Permit

We respectfully submit the following comments on the Department's draft Title V permit for the Osceola Generating Station, Permit No. 0970071-004-AV, dated 08/26/02.

### General Comment

The draft Title V permit includes numerous Conditions regarding NSPS monitoring requirements that are not explicitly set out in the facility's PSD permit (PSD-FL-273). Several of these NSPS requirements are not directly applicable to Emission Units 001-003 because the PSD permit, consistent with U.S. EPA guidance, authorizes alternative monitoring methods (e.g., use of Acid Rain certified NOx CEMS, Custom Fuel Monitoring Schedule). To streamline the Title V permit and to eliminate possible confusion regarding these overlapping monitoring requirements, we request that the superfluous NSPS requirements (as identified in the comments below) be deleted from the permit in accordance with U.S. EPA guidance on streamlining Title V permits.

### Comments on Section III: Emission Unit(s) and Conditions

1. Page 7 – Permitting note.

The last sentence of the "Permitting note" should be corrected to state: "Emission Units #001 and #002 began operation in 2001; Emission Unit #003 began operation in 2002."

2. Page 9 – Condition A.8

In the Visible Emissions paragraph, "%" should be added directly after "10."

3. Page 10 – Condition A.11

We understand that the provisions of this condition are part of the Department's rules but because the Department has not included this Condition in other Title V permits, we request that it be deleted to streamline the permit.

4. Page 11 – Condition A.15

As set forth in Specific Conditions A.28 and A.29, the facility's PSD permit authorizes alternative fuel monitoring to meet this NSPS Subpart GG requirement. To streamline the permit and to avoid confusion, we request that this Condition be deleted.

Alternatively, we request that this Condition cross-reference Specific Conditions A.28 and A.29 by adding at the end of thereof: "See Specific Conditions A.28 and A.29."

5. Page 12 – Condition A.17

Because the PSD permit requires a CEMS is used to determine compliance with the NOx emission limits, this Condition is unnecessary and should be deleted.

6. Page 12 – Condition A.18

Because a CEMS is used to demonstrate compliance with the NOx emissions limits, this Condition should be deleted in order to streamline the permit.

7. Page 12 – Condition A.19

This Condition sets out the requirement in 40 CFR 60.335(c)(2). Specific Condition A.14 provides that the requirement in 40 CFR 60.335(c)(2) is replaced by 40 CFR 75 Acid Rain certification tests of the NOx CEMS. To streamline the permit and to avoid confusion, we request that this Condition be deleted.

Alternatively, Specific Condition A.19 should be revised to cross reference Specific Condition A.14 by adding at the end of thereof: “See Specific Condition A.14.”

8. Page 12 – Condition A.20

We request that this Condition be deleted because: 1) initial performance testing has been completed, 2) SO2 stack testing is not required, and 3) the PSD permit (Condition III.29) does not require Method 20 testing to determine annual compliance with the NOx limits.

9. Page 13 and 15 – Conditions A.24 and A.30

Condition A.24 and Condition A.30 both address visible emissions testing. In order to streamline the permit, we request that these conditions be combined.

Alternatively, Condition A.24 should cross-reference Condition A.30 by adding at the end thereof: “See Specific Condition A.30.”

10. Page 13 through 15 – Conditions A.21, A.22, A.23, A.24, A.25, A.30

Each of these conditions refers to “initial performance tests.” The initial performance tests have been completed. In order to streamline the permit we request that these conditions be rewritten to eliminate the reference to “initial” testing, as appropriate.

11. Page 14 – Condition A.26

This Condition sets out the 40 CFR 60.335(f) requirements regarding determination of fuel sulfur content. As established in draft permit Condition A.27, PSD permit FL-273 (Condition III.31) states that when determining compliance with the NSPS Subpart GG SO<sub>2</sub> standard, "the applicant is responsible for ensuring that the procedures in 40 CFR 60.335 or 40 CFR 75 are used when determination of fuel sulfur content is made" (emphasis added). Thus, the facility is not limited to the ASTM test methods identified in 40 CFR 60.335. To avoid confusion, we request that Condition A.26 be revised by adding at the end thereof a cross reference to Specific Condition A.27, as follows: "[See Specific Condition A.27, authorizing use of 40 CFR Part 75 procedures to determine sulfur content.]"

12. Page 14 – Condition A.29

By letter dated November 19, 1999, EPA approved a custom fuel monitoring schedule for Osceola based on the facility's use of a NO<sub>x</sub> CEMS. The EPA letter approves the NO<sub>x</sub> CEMS as an alternative to monitoring NO<sub>x</sub> excess emissions under NSPS Subpart GG using water-to-fuel injection rates and fuel nitrogen content. Consistent with that custom fuel monitoring schedule, EPA policy provides fuel oil nitrogen content monitoring is not required for NSPS Subpart GG units that use a NO<sub>x</sub> CEMS. See EPA Region 4 letter from R. Douglas Neely, Chief, Air and Radiation Technology Branch, to Region 4 State and Local Air Directors, Subject: Approval of Routine Alternative Testing and Monitoring Procedures for Combustion Turbines Regulated Under New Source Performance Standards (May 26, 2000) (recognizing that Florida DEP has the delegated authority to waive the Subpart GG requirement to collect and analyze oil samples for nitrogen content where a CEMS is used to monitor NO<sub>x</sub> excess emissions). Thus, to avoid confusion, we request that the following be added to the end of Condition A.29: "[Per EPA Region IV custom fuel monitoring schedule and EPA policy, nitrogen content analysis of fuel oil is waived due to NO<sub>x</sub> CEMS.]"

13. Page 18 – Condition A.39

In accordance with the wording of 40 CFR § 60.13(c), we request that the words "required under 40 CFR 60.8" be inserted after the word "test" in the first line of this condition. This change is necessary to clarify that a CEMS performance evaluation is only required during performance tests under § 60.8 and not for annual compliance tests required by the Title V permit.

14. Pages 18 – 19 – Conditions A.40, A.41, and A.42

The PSD permit (condition III.44) authorizes the use of 40 CFR Part 75 CEMS certification and CEMS quality assurance requirements as an alternative to NSPS CEMS requirements. To avoid confusion and to streamline the permit, we request that Specific Conditions A.40, A.41 and A.42 be deleted. In addition, PSD permit condition III.44 should be added to the Title V permit.



Alternatively, if these Conditions are not deleted, we request the following changes:

- a) Condition A.40 -- This Condition unnecessarily duplicates requirements identified in Specific Condition A.41(1). As such, this Condition A.40 should be deleted.
- b) Condition A.41 -- We request clarification of the reference to Condition A.41 (i.e., "see A.41") at the end of this Condition.
- c) Condition A.42(1) -- Subparagraph (1) should be deleted because the units do not use a continuous monitoring system for opacity.

15. Page 20 - Condition A.48

Specific Condition A.14 provides that the NO<sub>x</sub> CEMS shall be used in lieu of the water/fuel monitoring system for reporting excess emissions. To streamline the permit, we request that Condition A.48 be deleted. Alternatively, to avoid confusion, Specific Condition A.14 should be cross-referenced at the end of this Condition by adding the following: "See Specific Condition A.14."

16. Page 24 - Condition A.60

We request that this Condition and the attached Compliance Plan be deleted. Reliant Energy has timely satisfied all requirements in the Compliance Plan. As such, the Compliance Plan and this Condition are unnecessary and irrelevant to current compliance and, thus, should be deleted.

17. Table 1-1 Summary of Air Pollutant Standards and Terms

We request a correction to the NO<sub>x</sub> standard for gas combustion from 9 ppmvd to 10.5 ppmvd.

In addition, we request a correction to the TPY equivalent emissions for oil combustion for all pollutants. The TPY equivalent emissions should be corrected to the following values as given in Attachment 5 of the Title V permit application:

NO <sub>x</sub>	121.13	TPY
VOC	3.00	TPY
CO	26.25	TPY
PM/PM10	12.75	TPY
SO <sub>2</sub>	39.11	TPY

18. Table 2-1 Summary of Compliance Requirements

We request a correction to the Minimum Compliance Test Duration for CO. The correct duration is “three 1-hour tests.”

Also, the Testing Time Frequency for SO<sub>2</sub> is blank. A more appropriate entry for the table would be “Per Natural Gas Monitoring Plan.”