



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 10, 2014

RECEIVED

FEB 18 2014

DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Matthew J. Raffenberg
Director of Environmental
Licensing and Permitting
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408

Re: Second Notice of Incompleteness for Proposed FPL Lauderdale Combustion Turbine PSD Application

Dear Mr. Raffenberg:

The U.S. Environmental Protection Agency has reviewed your greenhouse gas (GHG) Prevention of Significant Deterioration (PSD) permit application for the proposed Florida Power & Light (FPL) Lauderdale Combustion Turbine project (Project) that was received by the EPA on August 30, 2013, along with your supplemental information provided on October 29, 2013, (Completeness Response), in response to our initial request for additional information and have determined that your application still remains incomplete at this time. The following information is needed from you so that the EPA can continue its completeness review.

1. In the EPA's original incompleteness letter, the EPA requested FPL revise the best available control technology (BACT) analysis to include the alternative black start scenario using two of the existing gas turbines (GT). In FPL's Completeness Response #7, it was explained that based on the FDEP title V permit No. 0110037-010-AV, there was no change in the primary purposes of the GTs and thus no BACT analysis was required. EPA has reviewed the previously referenced title V permit and could find no language that supports the concept that two of the existing turbines are currently designated to be used as black start engines. Please provide additional information describing the operating scenario (*e.g.*, load, duration, frequency of startup) and emissions associated with black start operations as well as more detailed information showing that the two existing GTs proposed for this alternative have been (or could be) used as black start engines under the current title V permit.

To the extent that you cannot provide such data, please submit a BACT analysis for the two GTs under consideration still so that Economic, Energy, and Environmental Impact comparisons between the existing GTs and the new black start diesel generators can be made to ensure that the most appropriate (and energy efficient) BACT is selected for the purposes of black start capability.

2. According to FPL's Completeness Response #7, it was clarified that netting would no longer be considered as part of the project's PSD applicability analysis. However, during review of the non-GHG PSD permit being developed by FDEP for this project, it appears that a netting analysis

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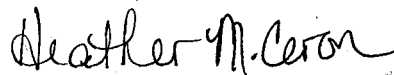
is still a part of the PSD analysis. Please clarify this discrepancy, and/or please submit an updated PSD applicability analysis to the State to ensure that no additional regulated NSR pollutants trigger PSD applicability as a result of no longer performing a netting analysis.

3. On January 13, 2014, the EPA received comments via email from National Oceanographic and Atmospheric Administration (NOAA) regarding the completeness of the Biological Assessment, which is required to determine any impacts under the Endangered Species Act. These comments were forwarded via email to FPL on January 28, 2014. As part of PSD application completeness, these comments need to be addressed.

Your application is considered incomplete until this information is received, evaluated, and the EPA has determined that the application contains all the information needed for the EPA to propose a permit decision. Please note, as the EPA continues review of your application, further information may be required for the EPA to continue processing your application and make a permit decision.

Please provide the requested additional information to the EPA by March 10, 2014. If more time is needed to respond to this request, please contact the EPA to discuss any additional time needed. If you have any questions please contact Randy Terry at (404) 562-9032 or terry.randy@epa.gov.

Sincerely,



Heather M. Ceron
Chief
Air Permits Section

cc: Jeff Koerner, FDEP
Randall R. LaBauve, FPL
Kennard F. Kosky, Golder Associates