



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

January 8, 2010

Sent via Electronic Mail

carmine.priore@fpl.com

Mr. Carmine A. Priore III, P.E.
Plant General Manager
FPL-West County Energy Center
20505 State Road 80
Loxahatchee, Florida 33470

Re: Additional Information, File Number 0990646-004-AV
Title V Air Operation Permit Revision Application
FPL-West County Energy Center

Dear Mr. Priore:

On November 12, 2009, the Department received a Title V air operation permit revision application for the subject facility via hard copy submission. Thank you for using the latest version of the air permit application form. The FPL-West County Energy Center is located at 20505 State Road 80, Loxahatchee in Palm Beach County, Florida.

In order to continue processing your application, the Department needs the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

1. **Initial Compliance Testing:** The emissions units are required to demonstrate initial compliance while firing natural gas and fuel oil. The permit revision application indicated that Unit 1 has been initially tested while firing natural gas with the last test performed on October 8, 2009. Was compliance successfully demonstrated by Unit 1 while firing natural gas? Have all initial compliance test reports been submitted for Unit 1? The compliance plan in the permit application, Attachment FPL-F1-CV3B, indicated Unit 2 has not completed initial testing while firing natural gas. In this permit application it was indicated that Unit 2A (the latest turbine to start up) started up on September 22, 2009. Based on this date it seems the initial compliance testing is due to be completed by March 22, 2010 for Unit 2. Both Units 1 and 2 have not completed initial compliance while firing fuel oil. Please provide an update on the initial compliance testing. Where the initial compliance testing when firing fuel oil has not yet been done, has the capability to fire fuel oil been installed?
2. **Excess Emissions:** In the cover letter to the permit revision application, changes were requested to the specific conditions related to fuel switching and cold startup. The Department needs additional specific information related to excess emissions during fuel switching and cold startup.
 - a. **Fuel Switching:** Please provide specific information on how fuel switching takes place, preferably information from the equipment manufacturer/vendor.
 - b. **Cold Startup:** Please provide the sequence of events for a cold startup, preferably information from the equipment manufacturer/vendor.
3. **Facility Plot Plan:** Please provide an enlarged plot plan identifying the emissions units. The plot plan in Attachment FPL-F1-C1 is very small. A larger plot plan can provide a better illustration of the layout of the equipment at the site.

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Page 2

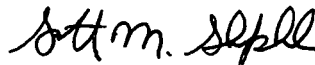
4. Auxiliary Boiler: On December 3, 2009, the Department issued Permit No. 0990646-003-AC, which affected the auxiliary boiler. Does Permit No. 0990646-003-AC alter the permit revision application form submitted? If so, please submit the revised affected page(s) of the form.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the responsible official (R.O.).

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety (90) days** or provide a written request for an additional period of time to submit the information.

If you should have any questions, you may contact me by telephone at 850/921-9532 or by e-mail at Scott.Sheplak@dep.state.fl.us.

Sincerely,



Scott M. Sheplak, P.E.
DEP - Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

copy to: Mr. John C. Hampp, FPL: john.hampp@fpl.com
Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.: kkosky@golder.com
Mr. Mike Halpin, P.E., DEP Siting: michael.halpin@dep.state.fl.us
Mr. Lennon Anderson, P.E., DEP SED: lennon.anderson@dep.state.fl.us
Mr. James E. Stormer, PBCHD: james_stormer@doh.state.fl.us
Ms. Ana Oquendo-Vazquez, U.S. EPA Region 4: oquendo.ana@epa.gov
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Friday, January 08, 2010 12:05 PM
To: 'carmine.priore@fpl.com'
Cc: 'john.hampp@fpl.com'; 'ken_kosky@golder.com'; 'oquendo.ana@epa.gov'; 'james_stormer@doh.state.fl.us'; Anderson, Lennon; Halpin, Mike; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: Request for Additional Information: FPL - West County Energy Center (0990646-004-AV)
Attachments: RAI 0990645-004-AV.pdf

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Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Tracking:

Livingston, Sylvia

From: Priore, Carmine [Carmine.Priore@fpl.com]
Sent: Friday, January 08, 2010 6:14 PM
To: Livingston, Sylvia
Cc: Hampp, John; ken_kosky@golder.com; oquendo.ana@epa.gov; james_stormer@doh.state.fl.us; Anderson, Lennon; Halpin, Mike; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR); Linkiewicz, Barbara P; Wilkinson, Sheila M; Hardy, Keith; CALLOW, EMMETT; BRYANT, TIMOTHY; Cunningham, Fred; Fawcett, David; Kulwicki, Scott
Subject: RE: Request for Additional Information: FPL - West County Energy Center (0990646-004-AV)

Ms. Livingston:

Please accept this correspondence as confirmation that as of January 8, 2010, the subject information and file regarding the West County Energy Center Title V Air Operation Permit Revision Application has been received for FPL review and response.

Thank you,

Carmine

Carmine Priore III, PE
Plant General Manager
Florida Power & Light Company
West County Energy Center
Site: 561 904-4904
Mobile: 561 818-8644
Carmine.Priore@FPL.com

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, January 08, 2010 12:05 PM
To: Priore, Carmine
Cc: Hampp, John; ken_kosky@golder.com; oquendo.ana@epa.gov; james_stormer@doh.state.fl.us; Anderson, Lennon; Halpin, Mike; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: Request for Additional Information: FPL - West County Energy Center (0990646-004-AV)

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Thank you,

Livingston, Sylvia

From: Oquendo.Ana@epamail.epa.gov
Sent: Monday, January 11, 2010 2:34 PM
To: Livingston, Sylvia
Cc: Walker, Elizabeth (AIR); Anderson, Lennon; Halpin, Mike; Sheplak, Scott; Gibson, Victoria
Subject: Re: Request for Additional Information: FPL - West County Energy Center (0990646-004-AV)

Hi,

EPA has targeted this application and permit for full review. I could access the scanned application through the website. Please keep us posted on the response to the RAI. Thanks.

Wishing you a great day!

Ana M. Oquendo
Air Permits Section
Air, Pesticides and Toxics Management Division U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303

email. quendo.ana@epa.gov
phone. 404-562-9781
fax. 404-562-9019

Please consider the environment before printing this email.

From: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>
To: "carmine.priore@fpl.com" <carmine.priore@fpl.com>
Cc: "john.hampp@fpl.com" <john.hampp@fpl.com>, "ken_kosky@golder.com" <ken_kosky@golder.com>, Ana Oquendo/R4/USEPA/US@EPA, "james_stormer@doh.state.fl.us" <james_stormer@doh.state.fl.us>, "Anderson, Lennon" <Lennon.Anderson@dep.state.fl.us>, "Halpin, Mike" <Mike.Halpin@dep.state.fl.us>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "Sheplak, Scott" <Scott.Sheplak@dep.state.fl.us>, "Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>
Date: 01/08/2010 12:05 PM
Subject: Request for Additional Information: FPL - West County Energy Center (0990646-004-AV)

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Thank you,

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM) Department of Environmental Protection

850/921-9506

sylvia.livingston@dep.state.fl.us

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