



Florida Department of Environmental Protection

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April 11, 2008

SENT BY ELECTRONIC MAIL – RECEIVED RECEIPT REQUESTED

Randall R LaBauve@fpl.com

Mr. Randall R. LaBauve, Vice President
Environmental Services Department
Florida Power and Light Company (FP&L)
700 Universe Blvd.
Juno Beach, Florida 33408

Re: DEP File No. 0990646-002-AC (PSD-FL-396)
West County Energy Center
Nominal 1,250 megawatt (MW) Natural Gas-fired Unit 3

Dear Mr. LaBauve:

On December 6, 2007 we received your application for an Air Construction Permit pursuant to the Rules for the Prevention of Significant Deterioration (PSD permit) to construct a natural gas-fired power plant to be known as Unit 3 at the FP&L West County Energy Center site in Palm Beach County. On March 14, 2008, we received supplemental information in support of the application submitted on December 6, 2007.

Pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. 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 application form.

Our request for additional information (RAI) dated January 18, 2008 identified the following issue as item 7 to which FP&L responded as item FDEP-7 in the submittal dated March 13, 2008:

7. There are three "non-major" facilities within the Significant Impact Area for this project. Two of the facilities, Hubbard Construction and Palm Beach Aggregates, were considered as one source with regards to the PSD increment analysis for Unit 3. Are these facilities adjacent to each other? If the property line of each facility is not adjacent to each other, then there is ambient air between them, which should be modeled.

EPA reviewed the response and provided a recent relevant interpretive memorandum dated June 22, 2007 that is applicable to such instances. The memorandum is located at:

www.epa.gov/region7/programs/artd/air/nsr/nsrmemos/leaseair.pdf

The subject memorandum provides four scenarios with regards to this issue. Please state which scenario is pertinent to this project and provide additional information to support the fact that the entire property is not ambient air. For example, with respect to the first scenario, the Department requires documentation that there is an existing business relationship between Palm Beach Aggregates and the other three companies.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please advise the professional engineer to make sure he/she uses the correct seal in compliance with the applicable requirements of the Florida Board of Professional Engineers.

If there are any questions, please call Debbie Nelson at 850/921-9537 or call me at 850/921-9523.

Sincerely,



A. A. Linero, Program Administrator
Special Projects Section
Bureau of Air Regulation

AAAL/dn

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