

Hampp, John

From: Walker, Elizabeth (AIR) [Elizabeth.Walker@dep.state.fl.us]
Sent: Wednesday, September 02, 2009 1:44 PM
To: Hampp, John
Subject: Air Permit fee for West County Energy Center PSD Modification

John,

As we discussed, FDEP will require payment of the \$250 application fee before processing the request to modify the West County Energy Center's PSD permit (0990646-001-AC/PSD-FL-354). The permit processing fee exemptions are only available for facilities that hold a current Title V Operation Permit.

Please remit the check for \$250.00 payable to the Florida Department of Environmental Protection to the address below:

Elizabeth Walker
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Please don't hesitate to contact me if you have any questions.

Elizabeth Walker
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9505

RECEIVED

SEP 03 2009

BUREAU OF AIR REGULATION

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.



August 31, 2009

Trina Vielhauer - Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

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SEP 01 2009
BUREAU OF AIR REGULATION

Re: Request to Revise Air Construction Permit 0990646-001-AC

Dear Mrs. Vielhauer,

West County Energy Center (WCEC) Plant requests that the PSD Permit PSD FL 354 (0990646-001-AC) for Combined Cycle Units 1 A-C and 2 A-C be revised to modify the Auxiliary Boiler permitted Hours of Operation: Specific Condition D.9 .

The West County Energy Center Units 1 A-C and Units 2 A-C require the use of steam from the auxiliary boiler primarily to provide turbine blade cooling during the startup of the combustion turbines. In its application FPL permitted the construction and operation of two nominal 85,000 lb/hr (99.8 MMBtu/hr) auxiliary boilers, Emission Unit ID 009. At the applicant's original request, the units were limited by permit for operation of less than 500 hours each per year. Subsequent to receiving the final PSD permit for West County Energy Center, FPL had decided that operation of the plant could be accomplished through the construction and use of only one of the permitted auxiliary boilers and that an additional auxiliary boiler would not be needed for Unit 3.

To provide adequate steam from the single installed auxiliary boiler (EU 009) for startup of the combustion turbines of Units 1, 2 and 3, FPL requests that Section III. "EMISSIONS UNIT SPECIFIC CONDITIONS; D. AUXILIARY BOILERS AND PROCESS HEATERS(EU009- EU010) (ID 014)" be modified to reflect WCEC's need to consolidate the original permitted operating hours of the Auxiliary boilers for the single installed auxiliary boiler and to accommodate Unit 3 by modification of Performance Requirement Condition 9 by changing it as follows:

From:

Hours of Operation: The hours of operation of each limited use gas-fueled auxiliary boiler shall not exceed 500 hours per year.

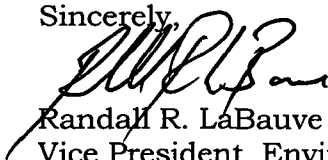
To:

Hours of Operation: The hours of operation of the limited use gas-fueled auxiliary boiler shall not exceed 1500 hours per year.

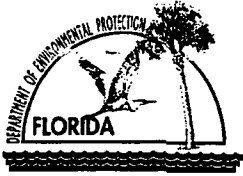
FPL also requests the modification of EU009 to reflect the installation of one auxiliary boiler instead of the two auxiliary boilers that were originally permitted for WCEC. FPL proposes to make administrative changes to the AC Permit during the submittal of the Title V permit application following commissioning of the WCEC units and FPL designation of commercial operation.

Thank you for your assistance in this matter, and, if you should have any questions, please do not hesitate to contact me at (561) 691-7001, or John Hampp at (561) 691-2894.

Sincerely,



Randall R. LaBauve
Vice President, Environmental Services
Florida Power and Light Company



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

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SEP 01 2009

I. APPLICATION INFORMATION

BUREAU OF AIR REGULATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Florida Power & Light Company	
2. Site Name: West County Energy Center (WCEC)	
3. Facility Identification Number: 0990042	
4. Facility Location... Street Address or Other Locator: 20505 State Road 80 City: Loxahatchee County: Palm Beach Zip Code: 33470	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Application Contact

1. Application Contact Name: John Hampp, Air Program Manager	
2. Application Contact Mailing Address... Organization/Firm: Florida Power & Light Company Street Address: 700 Universe Blvd. City: Juno Beach State: Florida Zip Code: 33408	
3. Application Contact Telephone Numbers... Telephone: (561) 691-2894 ext. Fax: (561) 691-7070	
4. Application Contact E-mail Address: John.Hampp@fpl.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

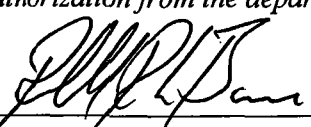
- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment


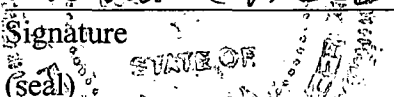
This application is for a revision to the existing air construction permit (Permit No. 0990646-001-AC) to request additional operating hours for the auxiliary boiler.

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Randall R. LaBauve, Vice President
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Florida Power & Light Company Street Address: 700 Universe Blvd. City: Juno Beach State: FL Zip Code: 33408
3. Owner/Authorized Representative Telephone Numbers... Telephone: (561) 691-7001 ext. Fax: (561) 691-7070
4. Owner/Authorized Representative E-mail Address: <u>Randall.R.LaBauve@FPL.com</u>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature 8/31/09 _____ Date

Professional Engineer Certification

1. Professional Engineer Name: Edward Prest Registration Number: 33225
2. Professional Engineer Mailing Address... Organization/Firm: FPL Street Address: 700 Universe Blvd. City: Juno Beach State: FL Zip Code: 33408
3. Professional Engineer Telephone Numbers... Telephone: (561) 691-2679 ext. Fax: (561) 691-7070
4. Professional Engineer E-mail Address: Ed.Prest@fpl.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>8-31-09</u> 

* Attach any exception to certification statement.