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BUREAU OF AIR REGULATION

May 22, 2008

A.A. Linero, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia St.
Tallahassee, FL 32399


**Re: Florida Power & Light Company
West County Energy Center Unit 3 Project
DEP File No. 0990646-002-AC (PSD-FL-396)**

Dear Mr. Linero:

Florida Power & Light Company (FPL) is in receipt of the Draft Prevention of Significant Deterioration (PSD) Permit and Technical Evaluation and Preliminary Determination (TEPD) for the West County Energy Center Unit 3 Project, issued by the Department on April 25, 2008. In accordance with the Department's Written Notice of Intent to Issue Air Permit in the above referenced file, this letter and three attachments constitute FPL's written comments on the Draft PSD Permit, TEPD, and Appendices. These comments address several clarifications and minor corrections that FPL would request be considered by the Department.

Thank you for the time and care you have taken in your review of the West County Energy Center Unit 3 Project. If you have any comments or questions regarding the attached, please feel free to contact me at (561) 691-7518.

Sincerely,


Barbara P. Linkiewicz
Director of Environmental Licensing

cc: Michael Halpin, DEP Siting Office
Ken Kosky, Golder Associates
Peter Cunningham, HGS

ATTACHMENT 1

West County Energy Center Unit 3 PSD Draft Air Permit, issued April 25, 2008 Florida Power & Light Company – Comments

May 22, 2008

1. **Page 3, Regulatory Classification:** We request the following clarification:

“The facility under construction was certified under the Florida Power Plant Siting Act (PPSA), 403.501-518, F.S. and Chapter 62-17, F.A.C. The Unit 3 project is also subject to a modification of the certification under the PPSA.”

2. **Page 8, Emissions Standards, Condition 12:** Footnote h is incorrectly placed on the Emissions Standards table. The footnote should be placed in the NOx row (under the CEMS Block Average column) and not in the CO row. In addition, Subpart KKKK states that the limit for all fuels apply on a 30-day rolling average and not on a 4-hour average. The 4-hour average only applies to simple cycle operation which is not applicable [please refer to 40 CFR 60.4350(g) and (h)]. For combined cycle and combined heat and power units with heat recovery, the limit for all fuels applies on a 30-day rolling average. Therefore, we request the following corrections:

In the Emission Standards table, the NOx row (under the CEMS Block Average column) should be revised: “2.0, 24-hr and 15, ~~4-hr~~ 30-day rolling”

“h. The ~~4-hr~~ 15 ppmvd NOx limitation is from Subpart KKKK and is in addition to the 2 ppmvd NOx BACT limits.”

3. **Page 9, Excess Emissions, Condition 17:** We request the following clarification. This requested change would clarify that the excess emissions condition applies to switches from oil to gas or gas to oil.

“As specified in this condition, excess emissions resulting from startup, shutdown, ~~oil to gas~~ fuel switches and documented malfunctions are allowed provided that...”

4. **Page 10, Emissions Performance Testing, Condition 20:** We request that the following language be added to the Table:

Method: “~~25A~~”

Description of Method and Comments: “~~Determination of Volatile Organic Concentrations~~”

5. **Page 19, Emergency Generators:** We request the following clarification:

ID: 018

Emission Unit Description: Two model year 2007-~~2010~~ nominal 2,250 kilowatts (kw) Liquid Fueled Emergency Generators – Reciprocating Internal Combustion Engines

ATTACHMENT 2

West County Energy Center Unit 3 Technical Evaluation and Preliminary Determination, issued April 25, 2008 Florida Power & Light Company – Comments

May 22, 2008

1. **Page 2, Figure 1:** SW St. Lucie should be removed from this Figure, as it is no longer a proposed FPL project.
2. **Page 2, Facility Description and Location:** For accuracy and consistency with the Site Certification Application (SCA), please make the corrections indicated below. In addition, attached please find an updated project location map (Figure 1.1.0-1 from the SCA) which could be used to replace Figure 3 in the Draft Technical Evaluation and Preliminary Determination.

“With respect to Figure 3 below, the ~~Town of Loxahatchee Groves is located approximately 4 miles east of the site. The Villages of Wellington Village of Wellington is the closest municipality to the Site and is located south of the Site and State Road 80. Loxahatchee Groves, the second closest municipality to the Site, is located approximately 4.5 miles east of the Site. and Royal Palm Beach are~~ is also located several miles generally east of the site. Other areas such as The Acreage, Deer Run and ~~Indian~~ Fox Trails are populated and unincorporated communities east of and near to the site. ~~The closest residence is in the Deer Run subdivision and is approximately 0.7 miles northeast of the northeast corner of the Site.~~”

3. **Page 3, Siting:** We request the following clarification:

“The two units already under construction were originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C. ~~An separate application for Unit 3 site certification is under review to modify the certification to reflect the capacity of the third unit.~~”

4. **Page 4, Stack Parameters:** For accuracy and consistency with the Draft PSD permit, please make the correction indicated below:

“Stack Parameters: Each HRSG has a combined stack that is at least 149 feet tall with a nominal diameter of ~~23~~ 22 feet.”

5. **Page 19, 4.6 New Source Performance Standards Applicable to CTG and DB:** Subpart KKKK states that the limit for all fuels applies on a 30-day rolling average and not on a 4-hour average. The 4-hour average only applies to simple cycle operation which is not applicable. For combined cycle and combined heat and power units with heat recovery, the limit for all fuels applies on a 30-day rolling average. We request the following clarifications:

“NO_x (gas).....or 0.43 lb/MWh (~~4-hr average~~);”

“Purchase contracts or tariff sheets....~~The short term nature of the NO_x limit under Subpart KKKK will necessitate an additional 4-hour limitation in the permit.~~ Subpart KKK also has....”

6. **Page 20, Table 9. Draft BACT Determination:** Footnote h is incorrectly placed on the Emissions Standards table. The footnote should be eliminated from the CO row, under the CEMS Block Average column. The footnote is already correctly placed in the NO_x row. In addition, Subpart

KKKK states that the limit for all fuels apply on a 30-day rolling average and not on a 4-hour average. The 4-hour average only applies to simple cycle operation which is not applicable [please refer to 40 CFR 60.4350(g) and (h)]. For combined cycle and combined heat and power units with heat recovery, the limit for all fuels applies on a 30-day rolling average. Therefore, we request the following corrections:

In the Emission Standards table, the NOx row (under the CEMS Block Average column) should be revised: “2.0, 24-hr and 15, ~~4-hr~~ 30-day rolling”

“h. The ~~4-hr~~, 15 ppmvd NOx limitation is from Subpart KKKK and is in addition to the 2 ppmvd NOx BACT limits.”

ATTACHMENT 3

West County Energy Center Unit 3 Section IV. Appendices, issued April 25, 2008 Florida Power & Light Company – Comments

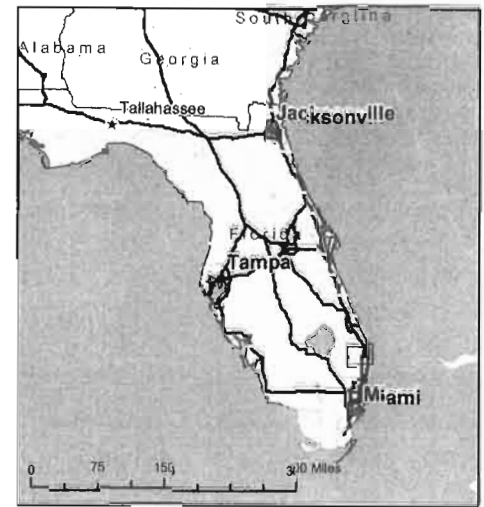
May 22, 2008

1. **Page BD-1, Section IV. Appendix BD:** Footnote h is incorrectly placed on the Emissions Standards table. The footnote should be placed in the NO_x row (under the CEMS Block Average column) and not in the CO row. In addition, Subpart KKKK states that the limit for all fuels apply on a 30-day rolling average and not on a 4-hour average. The 4-hour average only applies to simple cycle operation which is not applicable [please refer to 40 CFR 60.4350(g) and (h)]. For combined cycle and combined heat and power units with heat recovery, the limit for all fuels applies on a 30-day rolling average. Therefore, we request the following corrections:


In the Emission Standards table, the NO_x row (under the CEMS Block Average column) should be revised: “2.0, 24-hr and 15, ~~4-hr~~ 30-day rolling”

“h. The ~~4-hr~~, 15 ppmvd NO_x limitation is from Subpart KKKK and is in addition to the 2 ppmvd NO_x BACT limits.”

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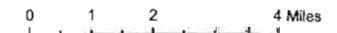



LEGEND

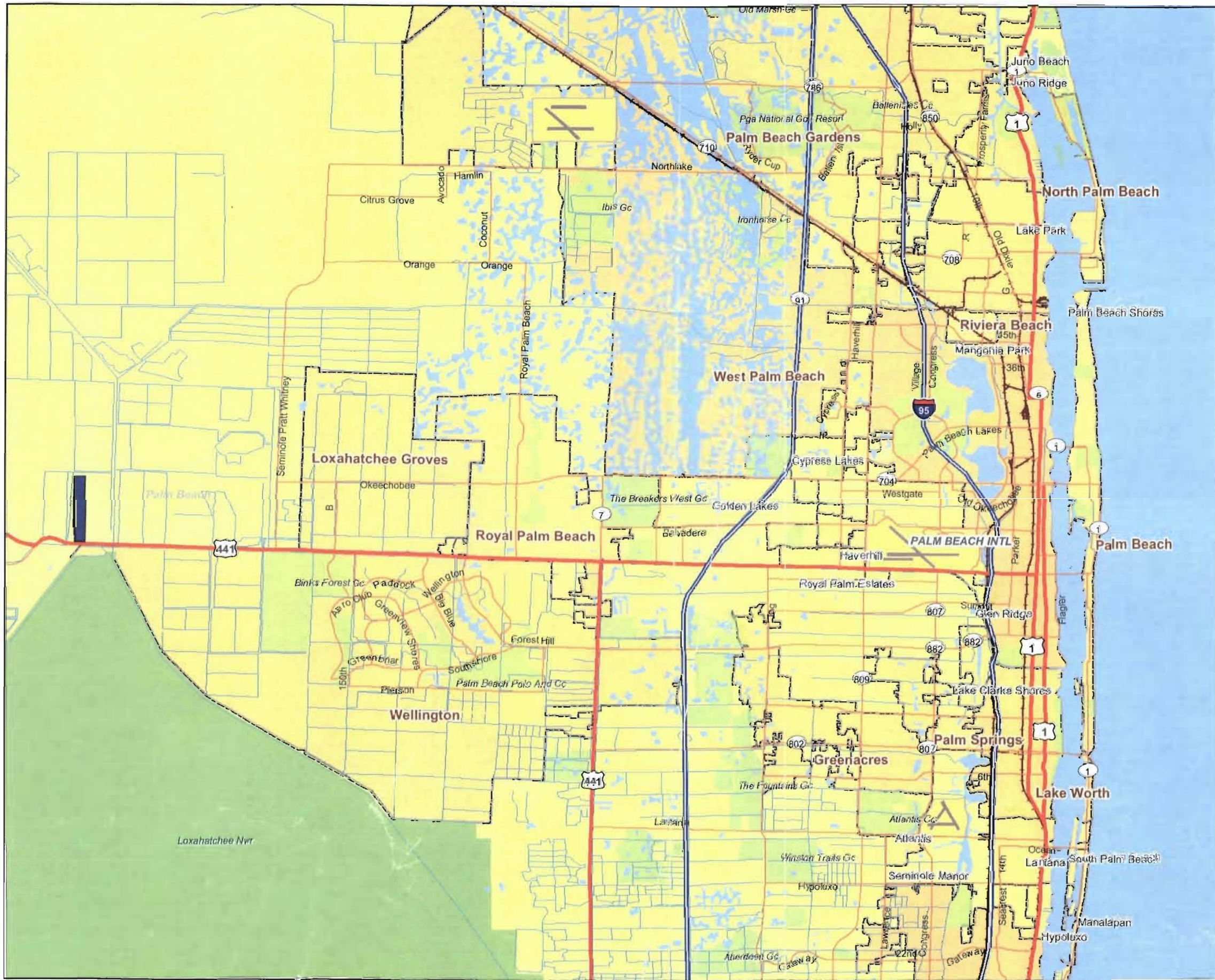
 FPL West County Energy Center

REFERENCE

1. ESRI MapX Kit Data and MapX
2. WCEC Location FPL
3. Loxahatchee NWR US Fish and Wildlife Service 7/10/2002.
4. Wellington Boundary, Village of Wellington 11/14/07



PROJECT			
WEST COUNTY ENERGY CENTER			
TITLE			
SITE LOCATION			
	PROJECT NO. 073-07652	SCALE AS SHOWN	REV. 0
	DESIGN KK 11/7/07		
	GIS RL 11/7/07		
	CHECK NV 11/7/07		
	REVIEW KK 11/7/07		
FIGURE 1.1.0-1			



LEGEND

 FPL West County Energy Center

REFERENCE

1. ESRI Media Kit Data and Maps.
2. WCEC Location FPL.
3. Loxahatchee NWR US Fish and Wildlife Service 7/10/2002.
4. Wellington Boundary. Village of Wellington 11/14/07.



PROJECT	WEST COUNTY ENERGY CENTER		
TITLE	SITE LOCATION		
	PROJECT No. 073-87652	SCALE AS SHOWN	REV. 0
	DESIGN KK 11/13/07		
	GIS RE 11/14/07		
	CHECK NV 11/14/07		
	REVIEW KK 11/19/07		



FIGURE 1.1.0-1

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