



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

Electronically Sent – Received Receipt Requested

John Hampp, Air Program Manager
Florida Power and Light Company (FPL)
700 Universe Boulevard
Juno Beach, Florida 33408

Re: Project No. 0710002-031-AC
Fort Myers Power Plant, Unit 2
Peak Operation Test Request
Letter of Authorization

Dear Mr. Hampp:

The Department acknowledges receipt of your request dated March 29, 2018 for a Peak Operation Test of Unit 2 at the referenced facility. FPL has recently upgraded the Unit 2 General Electric (GE) 7FA combustion turbines (CT) to increase unit efficiency and generation capability. The upgrades include: a GE .03 compressor reliability package; a GE .04 hot gas path package; a GE .05 compressor improvement package, DLN 2.6+ combustor components, and 3SAR turbine rotor upgrades.

FPL is requesting that the Department authorize a short-term variance (Peak Operation Test) from the existing permitted heat input limit of 1,783 million British thermal units per hour (MMBtu/hr) during the tuning and testing period for two CTs of Unit 2 to verify that GE performance guarantees have been met at heat input levels above the current permitted limit. Specifically, FPL is requesting that the two CTs of Unit 2 be allowed to reach a base-load heat input of 1,910 MMBtu/hr.

FPL has determined, and GE agrees, that the current permit emission concentration limits would be maintained during the period of operation above the current permitted heat input limit. FPL has evaluated the planned tuning and testing required and has estimated that operation above the current permitted heat input level would occur for a maximum of 24 hours per CT (total of 48 hours). Following the planned tuning and testing period, and prior to the return of Unit 2 to system dispatch, FPL will ensure that unit operating controls and settings conform to the normal method of operation within the permitted limits such that operation at the base-load heat input level does not exceed 1,783 MMBtu/hr at 59 degrees Fahrenheit (°F).

Based on the given circumstances, the Department approves your request for Peak Operation Testing on two CTs of Unit 2 with the following conditions:

1. The maximum allowable heat input to each affected Unit 2 CT during a peak operation test shall not exceed 1,910 MMBtu/hr;
2. The duration of peak operation testing for each affected CT shall not exceed at total of 24 hours;
3. The permitted concentration based emission limits in the current Title V air operation permit (No. 0710002-028-AV) for each affected CT shall not be exceeded during a peak operation test; and
4. The Permitting and Compliance Authorities shall be notified by email five business days prior to commencing the testing and within five business after completing the testing.

The Department will consider this action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative

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hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C. A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the following persons.

John Hampp, Florida Power and Light Company, john.hampp@fpl.com

Kaitlyn Tingum, Florida Power and Light Company, kaitlyn.tingum@fpl.com

Ken Nusche, Florida Power and Light Company, ken.nusche@fpl.com

DEP South District, SouthDistrict@dep.state.fl.us

Ms. Lynn Searce, DEP OPC: lynn.searce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.