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July 22, 2003

BUREAU OF AIR REGULATION

Alvaro Linero, P.E.
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

**Re: Comments to Draft Air Construction Permit; Ft. Myers Power Plant,
0710002-014-AC; Combustion Turbine Peaking Project Units 2A-2F.**

Dear Al,

Regarding the Draft Title V Permit referenced above, FPL has the following comments:

- Page SC-1, Specific Condition No. 4 Peaking Mode Operation- Please add the following language: "Emission limits are corrected to 15% O₂ **(lb/hr at ISO Conditions)**." This is consistent with the A/C permit language.
- Page SC-1 Specific Condition 5 (Compliance Testing) – Considering that the six combined cycle unit combustion turbines are identical, FPL is seeking approval that confirmation testing for peak operation be carried out on two of the units which would be considered representative of all six. This testing protocol (2 of 6) is consistent with the original certification tests of Units 2A-2F when first installed, and will reduce the quantities of emissions released if all six units were to be tested at peak firing conditions.

Thanks for your consideration in this matter, and, if you should have any questions, please do not hesitate to contact me at (561) 691-2877.

Very Truly yours,

A handwritten signature in black ink, appearing to read 'Kevin Washington', is written over a horizontal line.

Kevin Washington
Senior Environmental Specialist
Florida Power and Light Company

Cc: Ron Blackburn, Southwest District Office, FDEP