

RECEIVED

SEP 30 2008

BUREAU OF AIR REGULATION

Pro Db pule 290

September 26, 2008

Trina Vielhauer Bureau of Air Regulations Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399

Re: Exemption For Temporary Auxiliary Boiler, West County Energy Center Florida Power & Light - WCEC Permit No. 0990646-001-AC, PSD-FL-354

Dear Ms. Vielhauer:

The West County Energy Center (WCEC) will be bringing on site a temporary auxiliary boiler to provide steam as construction of the Unit 1 Heat Recovery Steam Generators (HRSGs) will require steam blows for the installed piping. The facility was permitted for the installation and operation of two 99.8 MMBtu/Hr permanent auxiliary boilers with an annual operating limit of 500 hours per year each boiler. During construction of WCEC Units 1 and 2 FPL the site plans to install only one auxiliary boiler and provide additional needed steam through use of the temporary auxiliary boiler. FPL has determined that the emissions from the temporary equipment is insignificant and would not result in an increase, or potential increase, in the emission of any pollutant exceeding the criteria for generic and temporary exemptions under Rule 62-210.300 (3)(b)(1). Additionally, the temporary auxiliary boiler specifications provided by the vendor demonstrate that the potential emissions from the permanent auxiliary boiler and those emissions temporary auxiliary boiler will be less than the permitted emissions from the auxiliary boilers permitted for WCEC Units 1 & 2.

The rental auxiliary boiler is temporary equipment that is on wheels will be moved off-site following the completion of steam blows on Unit 1. The portable temporary rental Do needs to compo with NSPS auxiliary boiler specifications are as follows:

Boiler Production Capacity: 75,000 lb/hr steam (gross)

Design heat Input: 109.0 MMBtu/hr (natural gas)

Stub Stack Height: 19ft AGL

Emissions (natural gas): NOx = 30 ppm (\sim 0.04 lb/MMBtu)

 $CO = 50 \text{ ppm } (\sim 0.06 \text{ lb/MMBtu})$

Duration of plant on site will be from 10/01/08 until 12/31/08 with estimated site usage = ~140 hrs @ Max. Design Heat Input; < 500 hrs total operating hours

FPL requests that the Department grant a conditional exemption from the requirement to obtain a construction permit for the use of the temporary auxiliary boiler in accordance with Rule 62-4.040 of the Florida Administrative Code (F.A.C.).

Sincerely,

John Hampp

Principal Environmental Specialist

FPL

JES/JB

700 Universe Blvd.

Juno Beach, FL 33458

561-691-2894 – office

john.hampp@fpl.com