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WEST COUNTY POWER PARTNERS, LLC

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Florida Power & Light Company
West County Energy Center – Units 1 & 2
Permit No. – PSD-FL-354
DEP File No. – 0990646-001-AC

WCPP Project 144553
WCPP Files 14.0100/32.0440
WCPP-2010-TP-672
October 29, 2010

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BUREAU OF
AIR REGULATION

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

**Subject: West County Unit # 1B – Distillate Oil Air Permit Compliance Test
Request for Compliance Discretion**

Dear Ms. Walker,

On behalf of Florida Power & Light Company (FPL) and its Designated Representative, Sheila M. Wilkinson, West County Power Partners, LLC (WCPP), EPC Contractor for construction of new combined cycle generating Units 1 and 2 at the FPL West County Energy Center, is submitting a written request for the Department to exercise discretion for compliance with 40 CFR Part 60.8 requiring distillate oil performance testing of West County Energy Center Unit 1B within a certain time frame. Following the successful completion of the performance testing and initial commercial operation of each of the West County Energy Center Units 1 and 2 combustion turbines (CTs) on natural gas last year, operation, tuning, and testing began for the CT's on distillate oil. The performance testing for Unit 1C on distillate oil was successfully completed on May 7, 2010. Initial operation on oil for Unit 1B began on August 23, 2010. Unit 1B has operated on oil for 117 hours over 19 days since initial operation. Maximum production rate on oil for Unit 1B was achieved on September 8, 2010. According to 40 CFR Part 60.8, performance tests must be successfully completed within 60 days of achieving the maximum production rate. Therefore performance tests on oil for Unit 1B should be completed no later than November 7, 2010.

Following initial operation, and subsequent achievement of maximum production rate on oil for Unit 1B, there have been significant challenges achieving desired operation on oil. Engineers from Mitsubishi Power Systems (MPS) have been conducting research and evaluating the root cause of impacts of oil operation on the SCR catalyst while operating at various loads. The catalyst on Unit 1B was damaged during the initial days of operation on oil and had to be replaced. While there were challenges during the commissioning of Unit 1C, damage to the catalyst requiring immediate replacement did not occur. The catalyst on Unit 1B has now been replaced and MPS believes that they have identified appropriate countermeasures to achieve the emission specifications and performance for the 501G CT's, and will strive to complete performance testing no later than November 7, 2010. However, we are submitting this request for discretion for compliance with the testing deadline because of the remaining uncertainty.

WCPP has determined that the inability of the Mitsubishi 501G CT to achieve the emission performance specifications provided in the FPL contract with MPS, and subsequently provided by FPL for the air construction permit application within the time frame specified in 40 CFR Part 60.8,

represents a condition beyond the control of WCPP and FPL for operation of the CT's on oil. WCPP is requesting that the Department exercise compliance discretion allowing for 3 additional days of oil operation on WCEC Unit 1B to successfully complete the emission performance test. The additional days of oil operation are expected to occur within the next 30 days.

Please confirm your approval of our request for discretion of compliance. Please contact Terry Apple at (913) 458-7220 or John Rachal at (561) 784-8048.

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC



Mike Perkins
Project Executive

cc: Dave McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
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