

WEST COUNTY POWER PARTNERS, LLC

11401 Lamar Avenue
Overland Park, Kansas 66211
Tel: (913) 458-2000
Fax: (913) 458-2934

527 Logwood
San Antonio, TX 78221
Ph: 210-475-8000
Fax: 210-475-8060

RECEIVED

DEC 07 2010

Florida Power & Light Company
West County Energy Center – Unit 3
Permit No. – PSD-FL-396
DEP File No. – 0990646-002-AC

BUREAU OF
AIR REGULATION

WCPP Project 161354
WCPP Files 14.0100/32.0440
WCPP3-2010-TP-308
December 6, 2010

E-mail, Express Mail

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: Compliance with Distillate Fuel Oil Sulfur
Limit (Fuel Sulfur Records)

Dear Ms. Walker:

On behalf of Florida Power & Light Company (FPL) and its Designated Representative, Sheila M. Wilkinson, the West County Power Partners, LLC (WCPP), EPC Contractor for construction of the new combined cycle generating Unit 3 at the FPL West County Energy Center, is submitting notification of compliance with the distillate fuel oil sulfur limit shall contain no more than 0.0015% sulfur by weight.

FPL West County Energy Center's Air Permit (Permit No. PSD-FPL-396), Section III. Emissions Units Specific Conditions, A. Combined Cycle Unit 3 – Combustion Turbine Generators (EU 013, 014, and 015), #30. Fuel Sulfur Records, b. ULSD Fuel Oil, states the following:

"Compliance with the distillate fuel oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to each Compliance Authority before initial startup. Sampling the fuel oil sulfur content shall be conducted in Accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM methods D5453-00, D129-91, D1552-90, D2622-94, or D4294-90. More recent versions of these methods may be used."

In accordance with these conditions, West County Power Partners is hereby submitting the analytical results for the sulfur sampling of the distillate fuel oil. Please note the result is 0.00073%, which is within the 0.0015% limit. Attached is the analytical report of the sulfur in the distillate fuel oil.

If you have any questions about this notification or the attachment, please contact Terry Apple at (913) 458-7220 or John Rachal at (561) 784-8048.

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC


for Mike Perkins
Project Executive

Enclosure

WS:hs

cc: Dave McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
Art Diem, USEPA Clean Air Markets Division
Leigh Pell, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Mike Halpin, FDEP Sitting Coordination Office
Syed Arif, FDEP, Administrator
Kimberly Ousdahl, ACF/JB
Sheila M. Wilkinson, FPL Designated Representative
Laxmana Tallam, PBC Health Department
Jim Stormer, PBC Health Department
Tom Tittle, PBC Health Department
Tom Young, FPL Construction Project General Manager
Carine Bullock, FPL Plant General Manager
David Fawcett, FPL West County Environmental Leader
Rachel Godino, FPL Environmental Project Manager
Audrey Rotrock, FPL
Robert Bennett, FPL Project Engineer
Mike Perkins, WCPP Project Executive
John Rachal, WCPP Senior Project Manager
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist

FLORIDA POWER & LIGHT CO
 ENERGY MARKETING & TRADING, 700 UNIVERSE BOULEVARD [EMT/JB], ATTN: EMT FUEL OIL ACCOUNTANT
 33408 JUNO BEACH FL
 United States



FAST TO THE POINT.
 SAYBOLT LP
 2810 S. Federal Hwy
 Ft Lauderdale, Florida
 33316
 Phone: (954)524-8772
 Fax: (954)524-2377
 E-mail: Saybolt.ftlauderdale@corelab.com
 Handled by: Armando Mejia

Reference North Fuel Oil Tank (A)
 Report no. 13056/2436 .01.I/10
 Report date 23/Nov/2010
 Object SAMPLING & ANALYSIS
 Product NO. 2 FUEL OIL
 Location LOXAHATCHEE, FPL PLANT - WEST COUNTY ENERGY CENTER
 Outturn Date 23/Nov/2010

CERTIFICATE OF ANALYSIS

Sample submitted as NO. 2 FUEL OIL
 Received Sampled by Saybolt Inspector
 Marked Samples taken from Shore Tank # CO1A - Running
 Date of sampling 23/Nov/2010
 Testing completed 23/Nov/2010 Time 17:
 Sealed Open
 Lab number 11243

Test	Analyte	Unit	Method	Specification	Result	
					Prefix	Figure
API gravity at 60 °F		°API	ASTM D 4052	30 - 40		34.8
Sulfur	Sulfur	mg/kg	ASTM D 5453	15 max		7.3

Precision parameters apply in the evaluation of the test results specified above. Please also refer to ASTM D3244 (except for analysis of RFG), IP367 and appendix E of IP standard methods for analysis and testing with respect to the utilization of test data to determine conformance with specifications.

This report is issued in accordance with the General Terms and Conditions of Saybolt Ft. Lauderdale and the recipient is deemed to have full knowledge thereof.

Remarks

Armando Mejia