



July 28, 2003

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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; Sanford Power Plant,
1270009-009-AC (PSD-FL-270C); Combustion Turbine Peaking Project
Units 4 & 5 CTs

Dear Al,

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

- Page SC-1, Specific Condition No. 50 Peaking Mode Operation Limits: - 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 51 (Compliance Procedures) – Considering that the eight 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 eight. This will reduce the quantities of emissions released if all eight 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 Mary Archer at (561) 691-7057.

Sincerely,

Roxane R. Kennedy
Plant General Manager
Sanford Power Plant
Florida Power and Light Company

Cc: T. Heron, FDEP, Tallahassee
L. Kozlov, FDEP, Central District Office