

WEST COUNTY POWER PARTNERS, LLC

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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

MAY 11 2010

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

BUREAU OF
AIR REGULATION

WCPP Project 144553
WCPP Files 14.0100/32.0440
WCPP-2010-TP-627
May 7, 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: West County Unit #1 C – Distillate Oil Air Permit Compliance Test
Request for Testing Extension

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 1 and 2 at the FPL West County Energy Center, is submitting a written request for a 60 day extension of required distillate oil performance testing of West County Unit 1C. In accordance with 40 CFR Part 60.8 and the State of Florida Conditions of Certification and Air Permit regulations, Unit 1C is required to successfully conduct distillate oil performance tests no later than May 15, 2010. Following the successful completion of the performance testing and initial commercial operation of each of the West County Units 1 & 2 Combustion Turbines (CTs) on natural gas last year, operation, tuning, and testing began for the CT's on distillate oil. Initial operation on oil began with Unit 1C on November 21, 2009, establishing the 180 day limit for performance testing no later than May 20, 2010. Maximum production rate on oil was achieved on March 16, 2010 for Unit 1C establishing the 60 day limit for performance testing no later than May 15, 2010.

Following initial operation, and subsequent attainment of maximum output on oil operation, there have been significant challenges in consistently achieving the desired emission performance during tuning and testing the unit on oil operation. Engineers from Mitsubishi Power Systems (MPS) have been on site identifying appropriate countermeasures to achieve the emission specifications for oil operation for the 501G CT's. While MPS has made significant progress towards completing tuning and testing of the CT's on oil and has attained the desired emission rates, we are concerned that the resolution to the combustion issues which will provide consistent oil operation within permit limits may not occur until after the May 15, 2010 deadline for the performance test. WCPP had originally scheduled the performance test, and subsequently rescheduled the test, prior to the May 15 deadline but as of the date of this letter, MPS has not been able to complete tuning and testing of the Unit 1C CT.

WCPP has determined that the inability of the Mitsubishi 501G CT to routinely achieve the emission performance specifications provided in the FPL contract with MPS and subsequently provided by FPL for the air construction permit applications, represents a condition beyond the control of WCPP and FPL for operation of the CT's on oil. As described above, WCPP is working

with MPS to resolve design, construction, and operational issues which are preventing Unit 1C from routinely demonstrating emission compliance and concluding oil tuning and testing with successful performance tests. WCPP is requesting that the Department grant an additional 60 day extension to the performance test deadline for the WCEC CT's on oil operation to July 14, 2010. While WCPP is hopeful that the resolution to the emission performance on Unit 1C occurs prior to the May 15, 2010 deadline, we are requesting this extension prior to that date in the event oil commissioning is delayed beyond that date.

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

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC



Mike Perkins
Project Executive

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cc: David McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
Art Diem, USEPA Clean Air Markets Division
Errin Pichard, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Tim Gray, FDEP Southeast District
Mike Halpin, FDEP Sitting Coordination Office
Laxmana Tallam, PBC Health Department (hard copy also)
Jim Stormer, PBC Health Department
Tom Tittle, PBC Health Department
E. N. Scoville II, FPL Director Construction
Sheila M. Wilkinson, FPL Designated Representative
Kimberly Ousdahl, FPL Controller - ACF/JB
Tom Young, FPL Construction Project General Manager
Carine Bullock, FPL Plant General Manager
Bob Bennett, FPL Project Engineer
David Fawcett, FPL West County Environmental Leader
Rachel Godino, FPL Environmental Project Manager
Mike Perkins, WCPP Project Executive
John Tidwell, WCPP Senior Project Manger
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist
Mark Bleckinger, WCPP Environmental Specialist