

WEST COUNTY POWER PARTNERS, LLC

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Florida Power & Light Company
West County Energy Center – Unit 3
Permit No. – PSD-FL-396
DEP File No. – 0990646-001-AC

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SEP 27 2010
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AIR REGULATION

WCPP Project 161354
WCPP Files 14.0100/32.0440
WCPP3-2010-TP-283
September 24, 2010

E-mail, Express Mail

Ms. Trina Vielhauer
Chief of Air Permitting
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject: West County Unit #3 Initial Notification for Natural Gas Fired Process Heaters (EU17)

Dear Ms. Vielhauer:

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 the new combined cycle generating units at the FPL West County Energy Center, submits initial notification for the two Natural Gas Fired Process Heaters identified in DEP Permit No. PSD-FL-396 as Emission Unit 017.

Initial startup of the gas heaters is expected to occur during the period of September 27 – 30, 2010. Should WCEC need to change the anticipated date of initial startup outside of the period provided, we will submit a subsequent notification to the Department. This information is being provided in accordance with 40 CFR 60.48c. Construction of the natural gas fired process heater units was completed on July 23, 2010. Regular operation of the gas heaters is scheduled to begin in November or December 2010.

In accordance with 40 CFR 60.8 and Chapter 62-297.310(7)(a)1, F.A.C., enclosed please find the manufacturer's certification that the emissions characteristics of the purchased model are at least as stringent as the BACT values. The final heater design specifications provided demonstrate that the input capacity for these emission units is limited to less than 10MMBtu/hr and are below the applicability threshold for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units regulated under 40CFR Subpart Dc. The manufacturer's certification is being provided in lieu of stack tests in accordance with DEP Permit No. PSD-FL-396.

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

Sincerely,

WEST COUNTY POWER PARTNERS, LLC


Mike Perkins
Project Executive

attachment

WS:hs

cc: Dave McNeal, USEPA Air, Pesticides and Toxics Management
Art Diem, USEPA Clean Air Markets Division
Elizabeth Walker, FDEP Air Resource Management
Leigh Pell, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Tim Gray, 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
Robert Bennett, FPL Project Engineer
Mike Perkins, WCPP Project Executive
John Rachal, WCPP Senior Project Manger
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist



Total Energy Resources, Inc.

8939 West 21st, Sand Springs, OK 74063
Phone: 918-447-0844 Fax: 918-447-0877

July 30, 2010

Mr. Chris Adams
Gulfstream Air Quality
Williams Gas Pipeline
P. O. Box 1396
Houston, TX 77251-1396

RE: Indirect Fired Water Bath Heater (TERI # 09H0826) for FPL WCEC Unit 3 gas yard

Chris:

The heat input and resultant emissions produced by the process heaters is below the source limit and the information included in this letter is being provided for information.

This letter is to certify that the "10 MMBtu/hour process heaters" supplied to Florida Power and Light, WCEC Unit 3 gas yard, have a firing rate below 10 MM Btu/hr. The firing rate of the heater at Maximum Design is 8.3 MM Btu/hr.

The process heater has emissions characteristics that are at least as stringent as the following BACT values:

- ◆ NO_x 0.095 lbs/MMBTU
- ◆ CO 0.084 lbs/MMBTU

Sulfur compounds are a result of concentrations in the fuel and are independent of any combustion device.

In accordance with F P & L requirements, we are having a local registered PE stamp the letter.
If you have any questions please feel free to contact me at my direct phone line 918-246-1672.

Sincerely,

Mark Gift
Process Engineer

