

# 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. – 0990646-002-AC

**RECEIVED**

**MAR 07 2011**

**BUREAU OF  
AIR REGULATION**

WCPP Project 161354  
WCPP Files 14.0100/32.0440  
WCPP3-2010-TP-344  
March 4, 2011

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 #3 Fuel Oil Air Permit Compliance Test Schedule  
(Update to February 25, 2011 letter)

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 at the FPL West County Energy Center – Unit 3, is submitting the Fuel Oil Air Permit Compliance schedule in accordance with 40 CFR Part 60.8 and the State of Florida Conditions of Certification and Air Permit regulations. The updated test schedule is detailed in Table 1.

Table I. Dates for initial start up activities at West County Energy Center Unit 3.

Units	Performance Emission Test	Opacity Observations
CT 3A	<b>March 18, 2011</b>	<b>March 18, 2011</b>
CT 3B	<b>March 22, 2011</b>	<b>March 22, 2011</b>
CT 3C	<b>March 14, 2011</b>	<b>March 14, 2011</b>
	60.8 (d) & PSD Permit, <u>Emissions Performance</u> <u>Testing, Condition #21</u>	60.7(a)(6), 60.11(b)& 60.7(a)(7)

Please note that the dates provided in Table I are subject to change. As the testing and tuning activities occur, WCPP will update FDEP of new revised dates when they are available. Please note that this notice is one of many notifications for West County Energy Center Unit 3.

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

  
by Mike Perkins  
Project Executive

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 Siting Coordination Office  
Syed Arif, FDEP, Administrator  
Kimberly Ousdahl, ACF/JB  
Sheila M. Wilkinson, FPL Designated Representative  
Laxmana Tallam, PBC Health Department (hard copy)  
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 Environmental Services  
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

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DEP File No. – 0990646-002-AC

WCPP Project 161354  
WCPP Files 14.0100/32.0440  
WCPP3-2011-TP-343  
March 4, 2011

Express Mail

Mr. David McNeal  
Air, Pesticides and Toxic Management Division  
USEPA Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104

Subject: WC Unit #3 Natural Gas Air Permit Compliance Testing and CEMS Certification  
(Update to February 25, 2011 letter)

Dear Mr. McNeal:

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 this notification in accordance with the regulations cited below.

**Operator:** FPL is the operator of the power plant. Mr. John Rachal, of WCPP, is the contact person at the plant for the EPC Contractor. Please send any correspondence in response to this notification to the following address:

Mr. John Rachal  
West County Power Partners, LLC  
West County Energy Center  
20505 State Road 80  
Loxahatchee, FL 33470

Pursuant to the requirements of 40 CFR Part 60 & 75, summarized below are the estimated dates for *Commercial Operation, Performance/Emission Testing and Continuous Emission Monitoring (CEM) Certification* for West County Energy Center Unit 3.

WCPP intends to proceed with Commercial Operation on the dates provided in Table 1 below unless directed by EPA to do otherwise.

**Dates and Duration of Initial Start up (Commercial Operation) of the Units:**

Initial startup of Unit CT 3B began on December 1<sup>st</sup> with a first sync date on December 3, 2010.  
Initial startup of Unit CT 3C began on December 16<sup>th</sup> with a first sync date on December 18, 2010.  
Initial startup of Unit CT 3A began on December 26<sup>th</sup> with a first sync date on December 29, 2010.  
These units will be utilizing natural gas and No. 2 ultra low sulfur distillate to fire during the startup and commissioning process for the plant.

Table I. Dates for initial start up activities at West County Energy Center Unit 3.

Units	Commercial Operation (Note #1)	Performance Emission Test	Opacity Observations	CEM Certification
CT 3A	<b>Dec. 26, 2010</b>	<b>March 16, 2011</b>	<b>March 16, 2011</b>	Feb. 25, 2011
CT 3B	<b>Dec. 1, 2010</b>	<b>March 20, 2011</b>	<b>March 20, 2011</b>	Feb. 15, 2011
CT 3C	<b>Dec. 16, 2010</b>	<b>March 12, 2011</b>	<b>March 12, 2011</b>	Feb. 16, 2011
40CFR Part 60 & 75 Req.	75.61(a),(2),(i)	60.8 (d) & PSD Permit, <u>Emissions Performance Testing</u> , Condition #21	60.7(a)(6), 60.11(b)& 60.7(a)(7)	75.61(a)(1)(i)& 60.7(a)(5)

Notes:

1. Commercial Operation is defined in 40 CFR 75 72 2, Subpart A as, "beginning to generate electricity for sale including the sale of test generation".
2. The 7-day calibration error test required for CEMS Certification began on February 25, February 15, and February 16, for CT 3A, CT 3B, and CT 3C, respectively. **The RATA will begin on March 13, March 16, and March 20, for CT 3C, CT 3A, and CT 3B. The cycle response time and linearity will begin on March 14, March 15, and March 19, for CT 3C, CT 3A, and CT 3B.**

Please note that the dates provided in Table I are subject to change. As the start-up activities occur, WCPP will update EPA and FDEP when a different certification test date is required. Please note that this notice is one of many notifications for West County Energy Center Unit 3.

If you have questions about this request, 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

WS:hs

cc: **Elizabeth Walker**, FDEP Air Resource Management  
Douglas Neeley, Chief of Air and Radiation Tech. Branch, USEPA Region 4  
Art Diem, USEPA Clean Air Markets Division  
Leigh Pell, FDEP Air Resource Management  
Lee Hoefert, FDEP Southeast District  
Mike Halpin, FDEP Siting Coordination Office  
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