

March 1, 2008

Jim Bradner
Air Program Aministrator
FDEP Central District
3319 Maguire Blvd, Suite 232
Orlando, FL 32803-3767



Re: 2007 Statement of Compliance - Title V Source

Dear Mr Bradner:

Enclosed please find the "Statement of Compliance" for FPL's Cape Canaveral Plant for Year 2007, as required by condition #52, Appendix TV-2. Attachments include copies of the notifications made to the FDEP District office on equipment malfunctions or downtime.

The following information is being submitted for the Cape Canaveral Plant as incidents of deviation for Year 2007. This information was previously submitted to the Florida Department of Environmental Protection in quarterly excess emissions reports for Compliance Year 2007. The attachments contain only malfunction "incidents of deviation" for process equipment and Continuous Emission Monitors required for State air permitted parameters and monitoring requirements. Other incidents of CEMS downtime, which are in accordance with the missing data substitution procedures identified in 40 CFR Part 75.30 (Acid Rain Program), have not been included in the attached information based on Florida Power & Light Company's understanding of these Regulations, which do not require a description of the incident to be included as part of the quarterly Electronic Data Report (EDR) submittal. (Ref.40 CFR Part 75.64(a)(2)vi).

Please feel free to contact me at (561) 691-2781 or Michael Szybinski at (561) 691-2898 if you have any questions.

Sincerely.

R. B. Fennell

Designated Representative

Florida Power & Light Company

CC:

Wanda Parker-Garvin FDEP District Office Al Linero FDEP Tallahassee

Rosalyn Hughes

US EPA Region 4



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RE	EASON FOR SUBMISSION	(Check one to indicate why this	s statement of compliance is being submitted)
√	Annual Requirement	☐ Transfer of Permit	☐ Permanent Facility Shutdown
	REPO	REPORT DEADLINE**	
	January 1 through D	ecember 31, of 2007 (year)	March 1, 2008
inc **Se	cluding any conditions that we e Rule 62-213.440(3)(a)2., F.	re added, deleted, or changed thro A.C.	
Site 1	Name: Cape Canaveral Fac	FLORIDA POWER & LIGHT ility ID No. 0090006-003-AV Check only one of the following	ounty: Brevard
	applicable, the Acid Rai requirements associated v	n Part, and there were no repo	itions of the Title V Air Operation Permit and, if retable incidents of deviations from applicable vn of process, fuel burning or emission control d identified above.
<u>X</u>	applicable, the Acid Rain applicable requirements a control equipment, or more	Part; however, there were one of ssociated with malfunctions or br	itions of the Title V Air Operation Permit and, if or more reportable incidents of deviations from reakdowns of process, fuel burning or emission ing period identified above, which were reported wing information is included:
	 Date of report previo Description of the in 	ously submitted identifying the incicident.	ident of deviation.
	applicable, the Acid Rain reportable incidents of de-	n Part, EXCEPT those identified viations from applicable requirement	itions of the Title V Air Operation Permit and, if d in the pages attached to this report and any ents associated with malfunctions or breakdowns monitoring systems during the reporting period

1. Emissions unit identification number.

information is included:

- Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
- 3. Description of the requirement of the permit condition.
- 4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).

identified above, which were reported to the Department. For each item of noncompliance, the following

- 5. Beginning and ending dates of periods of noncompliance.
- Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
- 7. Dates of any reports previously submitted identifying this incident of noncompliance.

For each incident of deviation, as described in paragraph B. above, the following information is included:

- 1. Date of report previously submitted identifying the incident of deviation.
- Description of the incident.

DEP Form No. 62-213.900(7)

Effective: 6-02-02

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

(Signature of Title V Source Responsible Official)

2 | 2 5 | 0 8 (Date)

Name: Brad Williams

Title: Plant General Manager

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

(Signature of Acid Rain Source Designated Representative)

(Date)

Name: R. B. Fennell

Title: Designated Representative

*The DR signature/authorization is only applicable to the Acid Rain documentation.

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency(EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

DEP Form No. 62-213.900(7)

Effective: 6-02-02

2

February 25th, 2008

Mr. Leonard Kozlov, PE Administrator Florida Department of Environmental Protection Central District Air Program 3319 Maguire Blvd, Suite 232 Orlando, Florida 32803-3767

Dear Mr. Kozlov:

Semi-Annual Monitoring Report Florida Power & Light - Cape Canaveral Plant Title V Permit No. 0090006-001-AV

Florida Power & Light (FPL) submits this Semi-Annual Monitoring Report for the above referenced facility. Title V Permit Condition 43 of Appendices TV-4 (TV-1, 2, 3 or 4), which implements Rule 62-213.440(1)(b) 3a., states that "The permittee shall submit reports of required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports."

monitoring and has reviewed all related monitoring information for the period of July 1, 2007 through December 31, 2007. The attachments identify any instances of Permit deviations from Permit "Monitoring Conditions" previously submitted quarterly or as required by Permit.

FPL has reviewed the above-referenced Title V permit for conditions related to

If you have any questions or require additional information, please contact either myself at (321) 637-2221 or Fritz Reme at (321) 637-2239.

Sincerely, Bulhilly

Brad Williams

Plant General Manager (Responsible Official)

Attachments

CC:

pcc:

Tom Mulligan **FDEP District Office** Al Linero FDEP Tallahassee File

Fritz Reme PCC/PCC Mary Archer JES/JB Ralph Larrubia GPA/JB



October 25, 2007

Mr. Leonard Koslov, Manager Florida Department of Environmental Protection Central District 3319 Maguire Blvd., Suite 232 Orlando, FL 32803-3767

RE:

FPL, Cape Canaveral Power Plant - Units 1 and 2

Quarterly Excess Emissions Reports

Third Quarter of 2007

Dear Mr. Koslov:

In accordance with the requirements of the Title V Air Operation Permit 0090006-001-AV, please find enclosed the Opacity Emissions Quarterly Report Summary for the Third Quarter of 2007 for Units 1 and 2 of FPL's Cape Canaveral Power Plant. In addition, this is to certify that at no time during the Third Quarter of 2007 sampling period was the sulfur dioxide emission limit of 2.75 Lbs/MMbtu three hour rolling average exceeded.

If you have any questions, please contact me at (321) 637-2221 or Brad Williams at (321) 637-2251.

Sincerely, Lowell Institu

Lowell Trotter

Plant General Manager

Cape Canaveral Power Plant

Certified Mail - 7003 1010 0001 3752 9306

cc: M.J. Archer

File - PCC - Quarterly Emissions Reports

	FROM <u>07 / 01 / 07</u>	ТО	09 / 30 / 07	
SOURCE NAME: _	Cape Canaveral Plant	COMPANY:F	lorida Power and Light Co.	
EMISSION POINT:	Stack No. 2	ADDRESS: 6	000 N. U.S. 1 ocoa, FL 32927	
EMISSION TYPE: _	OPACITY			
	PERATION TIME: CERTIFICATION OR AUDIT: CTURER & MODEL NO. :	1632 HOURS 4/14/01 Phoenix Instrume	nts OPAC 20/20	
REASON FOR EXC	ESS EMISSIONS	D	URATION	_
CLEANING / SOOTE PROCESS / EQUIPM CONTROL EQUIPM UNKNOWN CAUSE FUEL PROBLEMS	MENT MALFUNCTION ENT FAILURE	intenance)	0 Hours 0 Hours 0.2 Hours 0 Hours 0 Hours 0 Hours 0 Hours 0 Hours	
	OF EXCESS EMISSIONS* OF EXCESS EMISSIONS	-	0.2 Hours 0.012 %	
	ssions" for startup/shutdown/load d on this form. Malfunction event sted on this report.			
SUBMITTED HEREI	HAVE PERSONALLY EXAMINED IN, AND BASED ON MY INQUIR HE INFORMATION, BELIEVE TH	Y OF THOSE INDIVID	DUALS IMMEDIATELY RESP	ONSIBLE
Lowell Trotte		rothe	PLANT GEN MGR TITLE	/0/25/0

FROM <u>07 / 01 / 07</u>	TO <u>09 / 30 / 07</u>
SOURCE NAME: Cape Canaveral Plant	COMPANY: Florida Power and Light Co.
EMISSION POINT: Stack No. 1	ADDRESS: 6000 N. U.S. 1 Cocoa, FL 32927
EMISSION TYPE: OPACITY	ž .
TOTAL SOURCE OPERATION TIME: DATE OF LATEST CERTIFICATION OR AUDIT: MONITOR MANUFACTURER & MODEL NO. :	1780 HOURS 4/24/01 Phoenix Instruments OPAC 20/20
REASON FOR EXCESS EMISSIONS	DURATION
STARTUP / SHUTDOWN / LOAD CHANGE CLEANING / SOOTBLOWING PROCESS / EQUIPMENT MALFUNCTION CONTROL EQUIPMENT FAILURE UNKNOWN CAUSE FUEL PROBLEMS OTHER KNOWN EXCESS EMISSIONS (Offline / Main	0 Hours
TOTAL DURATION OF EXCESS EMISSIONS* PERCENT OF TIME OF EXCESS EMISSIONS	0.0 Hours 0.00 %
	change, cleaning/sootblowing that are allowed by permit or nours which result in opacity greater than the steady state
I CERTIFY THAT I HAVE PERSONALLY EXAMINED A SUBMITTED HEREIN, AND BASED ON MY INQUIRY FOR OBTAINING THE INFORMATION, BELIEVE THE	OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBL
Lowell Trotter Arwill Inothing NAME (Print) SIGNATURE	Plant General Manager /0/25/07



January 28, 2008

Mr. Leonard Koslov, Manager Florida Department of Environmental Protection Central District 3319 Maguire Blvd., Suite 232 Orlando, FL 32803-3767

RE:

FPL, Cape Canaveral Power Plant - Units 1 and 2

Quarterly Excess Emissions Reports

Fourth Quarter of 2007

Dear Mr. Koslov:

In accordance with the requirements of the Title V Air Operation Permit 0090006-001-AV, please find enclosed the Opacity Emissions Quarterly Report Summary for the Fourth Quarter of 2007 for Units 1 and 2 of FPL's Cape Canaveral Power Plant. In addition, this is to certify that at no time during the Fourth Quarter of 2007 sampling period was the sulfur dioxide emission limit of 2.75 Lbs/MMbtu three hour rolling average exceeded.

If you have any questions, please contact me at (321) 637-2251

Sincerely,

Brad Williams

Plant General Manager

Cape Canaveral Power Plant

cc: M.J. Archer

File - PCC - Quarterly Emissions Reports

Certified Mail - 7003 1010 0001 3752 9481

	FROM <u>10 / 01 / 07</u>		TO <u>12 / 31 / 07</u>	
SOURCE NAME: _	Cape Canaveral Plant	COMPANY: _	Florida Power and Light C	<u>0.</u>
EMISSION POINT:	Stack No. 2	ADDRESS: _	6000 N. U.S. 1 Cocoa, FL 32927	
EMISSION TYPE: _	OPACITY			
	PERATION TIME: CERTIFICATION OR AUDIT: ACTURER & MODEL NO. :	975 HOU 4/14/01 Phoenix Instru	RS uments OPAC 20/20	
REASON FOR EXC	ESS EMISSIONS		DURATION	
CLEANING / SOOT PROCESS / EQUIP CONTROL EQUIPM UNKNOWN CAUSE FUEL PROBLEMS	MENT MALFUNCTION IENT FAILURE	intenance)	0 Hours	
	OF EXCESS EMISSIONS* E OF EXCESS EMISSIONS		0.0_ Hours 0.00_ %	
	issions" for startup/shutdown/load ed on this form. Malfunction even sted on this report.			
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Brad Willian		Mu	Plant General Marasar	1/28/08

	FROM <u>10 / 01 / 07</u>		TO <u>12 / 31 / 07</u>
SOURCE NAME: _	Cape Canaveral Plant	COMPANY:	Florida Power and Light Co.
EMISSION POINT:	Stack No. 1	ADDRESS:	6000 N. U.S. 1 Cocoa, FL 32927
EMISSION TYPE:	OPACITY		
		931 HOU 4/24/01 Phoenix Instr	
REASON FOR EXC	CESS EMISSIONS		DURATION
CLEANING / SOOT PROCESS / EQUIP CONTROL EQUIPM UNKNOWN CAUSE FUEL PROBLEMS	MENT MALFUNCTION MENT FAILURE	enance)	0 Hours Hours
	OF EXCESS EMISSIONS* E OF EXCESS EMISSIONS		0.0 Hours 0.00_ %
	ed on this form. Malfunction event he		g/sootblowing that are allowed by permit or ult in opacity greater than the steady state
SUBMITTED HERE	THE INFORMATION, BELIEVE THE	OF THOSE IN	DIVIDUALS IMMEDIATELY RESPONSIBLI

Plant General Manager

TITLE

Rev.0: 9/08/98

Brad Williams NAME (Print)

SIGNATURE

-		on microy necomine	
	F	Episode List Report Version 57.0 lorida Power & Light PCC	
		/2007 00:00 to 12/31/2007 23:59 nerated: 2/25/2008 17:21 Types: OVER	
	Pollutant:	10pac Episode: 1 Opacity Exc	ess
Incident Start	Incident End Type Value	/ Limit (%Dev) Reason	Action

Found No Episodes of the above Types for this Channel

GE Energy NetDAHS©

GE Energy NetDAHS©

Episode List Report Version 57.0 Florida Power & Light PCC

from 7/1/2007 00:00 to 12/31/2007 23:59 Generated: 2/25/2008 17:21 Types: OVER

Pollutant: 20pac Episode: 2 Opacity Excess

			,											
Start		End		Type	Value /	/	Limit	(%Dev)		Reason		Ac*	tion	
07/19/07	10:00	- 07/19/07	10:05	1: OV	46.100	/	40.000	(15.3%)	1	Burner Malfunction	1	Other	Mechanical	C
07/19/07	10:30	- 07/19/07	10:35	1: OV	51.200	/	40.000	(28.0%)	1	Burner Malfunction	1	Other	Mechanical	С

Total Reported Time: 4416.0 Hours

Incident

Incident

TOTAL DURATION 0.20 Hours

1: Over limit

ver limit 12: Burner Malfunction

= 0.20 Hours

= 0.20 Hours

16:38

02/25/2008

13 | Total Fuel Oil Equivalent

Avg Net Oper Heatrate

Net Heat Rate

Output Per Bbl

Output By Oil

Output By Gas

Output By Dist

Water Evaporated

Cir Water Max Min Inlet

Cir Water Max Min Outlet

Plt-Max Hr Gen, Output, Hr

Equiv Bbl Propane

Equiv Bbl Dist Startup

Date Sta Mx Hour Gen Date Sta Mx Hour Out

Make Up Water

14

15

16

17

18

18a

19

20

21

22

23

24

25

26

Comments:

Florida Power and Light Company **Fossil Steam Generation Data**

Totals

1,192,616 82,609 1,110,007 33.91 56.98 544,697 6,423 8,350,153 168,907 0 11,991 2,979.06

1,265,174.7

1,809,871.4

10,674.6

9,934.6

348,566.2

761,440.8

613.3

0.0

0

0.0

18.7

0.0

		7/1/2007 to	0 12/31/20	07
Item	Units	PCC-01	PCC-02	
01 Generation	Mwh	609,496	583,120	
02 Auxillaries	Mwh	43,099	39,510	
03 Net Output	Mwh	566,397	543,610	
04 Capacity Factor	%	36.02	31.97	
05 Net Output Factor	%	59.32	54.74	
06 Fuel Oil Used	Bbl	271,342	273,355	
07 Heat Value Per Bbl	Kbtu	6,423	6,423	
08 Gas Fuel Used	MMBTU	4,295,612	4,054,541	
08a Gas Fuel Used Off line	MMBTU	90,201	78,706	
09 Fuel Oil Used Off line	Bbl	0	0	
10 Mw Used Off line	Mwh	6,234	5,757	
11 Unit Operation	Hrs.Min	2,711.36	2,606.58	
11a Oil Operation	Hrs.Min	0.00	0.00	
12 Oil Equv. Of Gas Used	Bbl	650,850.3	614,324.4	

Bbl

Btu/Kwh

Btu/Kwh

Kwh

Mwh

Mwh

Mwh

Klbs

%

F

F

Bbl

Bbl

Mwh, Hrs

922,192.4

10,662.6

9,914.8

614.1

0.0

0

0.0

121/73

123/75

0

9.1

0.0

173,944.7

392,452.3

887,678.9

10,690.3

9,955.1

612.3

0.0

0.0

113/57

124/77

0

9.5

0.0

0

174,621.5

368,988.5

August 24, 2007

Mr. Leonard Kozlov, PE Administrator Florida Department of Environmental Protection Central District Air Program 3319 Maguire Blvd, Suite 232 Orlando, Florida 32803-3767

Dear Mr Kozlov:

Re: Semi-Annual Monitoring Report Florida Power & Light - Cape Canaveral Plant Title V Permit No. 0090006-001-AV

Florida Power & Light (FPL) submits this Semi-Annual Monitoring Report for the above referenced facility. Title V Permit Condition 43 of Appendices TV-4 (TV-1, 2, 3 or 4), which implements Rule 62-213.440(1)(b) 3a., states that "The permittee shall submit reports of required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports."

FPL has reviewed the above-referenced Title V permit for conditions related to monitoring and has reviewed all related monitoring information for the period of January 1, 2007 through June 30, 2007. The attachments identify any instances of Permit deviations from Permit "Monitoring Conditions" previously submitted guarterly or as required by Permit.

If you have any questions or require additional information, please contact either myself at (321) 637-2221 or Brad Williams at (321) 637-2251.

Sincerely,

Lowell Inthe Lowell Trotter

Plant General Manager (Responsible Official)

Attachments

CC:

Tom Mulligan **FDEP District Office** Al Linero FDEP Tallahassee File

Certified Mail - Leonard Koslov 7003 1010 0001 3752 9269 Tom Mulligan 7003 1010 0001 3752 9276 Al Linero 7003 1010 0001 3752 9283

bcc: Fritz Reme PCC/PCC Mary Archer JES/JB Ralph Larrubia GPA/JB



April 26, 2007

Mr. Leonard Koslov, Manager Florida Department of Environmental Protection Central District 3319 Maguire Blvd., Suite 232 Orlando, FL 32803-3767

RE:

FPL, Cape Canaveral Power Plant - Units 1 and 2

Quarterly Excess Emissions Reports

First Quarter of 2007

Dear Mr. Koslov:

In accordance with the requirements of the Title V Air Operation Permit 0090006-001-AV, please find enclosed the Opacity Emissions Quarterly Report Summary for the First Quarter of 2007 for Units 1 and 2 of FPL's Cape Canaveral Power Plant. In addition, this is to certify that at no time during the First Quarter of 2007 sampling period was the sulfur dioxide emission limit of 2.75 Lbs/MMbtu three hour rolling average exceeded.

If you have any questions, please contact me at (321) 637-2221 or Brad Williams at (321) 637-2251.

Sincerely,

Lowell Trotter

Plant General Manager

Cape Canaveral Power Plant

cc: M.J. Archer

File - PCC - Quarterly Emissions Reports

Certified Mial - 7003 1010 0001 3752 9139

	FROM <u>1 / 01 / 007</u>		TO <u>3 / 31 /</u>	07
SOURCE NAME: _	Cape Canaveral Plant	COMPANY:	Florida Power ar	nd Light Co.
EMISSION POINT:	Stack No. 1	ADDRESS:	6000 N. U.S. 1 Cocoa, FL 3292	
EMISSION TYPE: _	OPACITY			
	CERTIFICATION OR AUDIT:	712 HO 4/24/01 Phoenix Inst	URS truments OPAC 20/2	0
REASON FOR EXC	ESS EMISSIONS		DURATION	
CLEANING / SOOTE PROCESS / EQUIPT CONTROL EQUIPM UNKNOWN CAUSE FUEL PROBLEMS	MENT MALFUNCTION IENT FAILURE	tenance)	0 Hours	
	OF EXCESS EMISSIONS* OF EXCESS EMISSIONS		0.0 Hours 0.00 %	
*Note: "Excess Emirule are <i>not</i> recorde permitted limit are lis	ssions" for startup/shutdown/load c d on this form. Malfunction event h sted on this report.	hange, cleanir nours which res	ng/sootblowing that a sult in opacity greate	re allowed by permit or r than the steady state
SUBMITTED HERE	HAVE PERSONALLY EXAMINED A IN, AND BASED ON MY INQUIRY HE INFORMATION, BELIEVE THE	OF THOSE IN	IDIVIDUALS IMMED	
Lowell Trotter NAME (Print)	Lowell Inthe	Plant Ge	neral Manager TITLE	#-26-07 DATE



April 26, 2007

Mr. Leonard Koslov, Manager
Florida Department of Environmental Protection
Central District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

RE:

FPL, Cape Canaveral Power Plant - Units 1 and 2

Quarterly Excess Emissions Reports

Second Quarter of 2007

Dear Mr. Koslov:

In accordance with the requirements of the Title V Air Operation Permit 0090006-001-AV, please find enclosed the Opacity Emissions Quarterly Report Summary for the Second Quarter of 2007 for Units 1 and 2 of FPL's Cape Canaveral Power Plant. In addition, this is to certify that at no time during the Second Quarter of 2007 sampling period was the sulfur dioxide emission limit of 2.75 Lbs/MMbtu three hour rolling average exceeded.

If you have any questions, please contact me at (321) 637-2221 or Brad Williams at (321) 637-2251.

Sincerely,

Lowell Trotter

Plant General Manager

Lowell Inst

Cape Canaveral Power Plant

Certified Mail - 7003 1010 0001 3752 9252

cc: M.J. Archer

File - PCC - Quarterly Emissions Reports

	FROM <u>4 / 1 / 07</u>	ТО	6 / 30 / 07	
SOURCE NAME:	Cape Canaveral Plant	COMPANY: _	Florida Power and Light Co.	
EMISSION POINT:	Stack No. 2	ADDRESS: _	6000 N. U.S. 1 Cocoa, FL 32927	
EMISSION TYPE:	OPACITY			
	RATION TIME: RTIFICATION OR AUDIT: TURER & MODEL NO. :	1577.5 HOU 4/14/01 Phoenix Instru	RS Iments OPAC 20/20	
REASON FOR EXCES	S EMISSIONS		DURATION	
STARTUP / SHUTDOV CLEANING / SOOTBLO PROCESS / EQUIPMEN CONTROL EQUIPMEN UNKNOWN CAUSE FUEL PROBLEMS OTHER KNOWN EXC	OWING ENT MALFUNCTION	aintenance)	0 Hours 0 Hours 0.1 Hours 0 Hours 0 Hours 0 Hours 0 Hours 0 Hours	
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SUBMITTED HEREIN,		RY OF THOSE IND	AR WITH THE INFORMATION DIVIDUALS IMMEDIATELY RE N IS ACCURATE.	
Lowell Trotter	Lowell S. SIGNATURE	1 ster	PGM	7/30/07