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Viera, Florida 32940

Chairman, Board of County Commissioners
400 South Street
Titusville, Florida 32780

DEP MEDIA HOT SHEET

EMAIL TO:

**TO: KRISTINE ROSELIUS, OFFICE OF COMMUNICATIONS
HOWARD L. RHODES, DIRECTOR, DARM
THE APPROPRIATE BUREAU CHIEF OR OPAPM/OAPCO ADMINISTRATOR IN DARM**

FAX: 850/921-6227 OR SC 291-6227 (COMMUNICATION OFFICE)

TOPIC: Oleander Power Plant PSD Application

DATE: 8/11/99 **REPORTERS NAME:** Aaron Davis

FROM: Florida Today (Newspaper) **TELEPHONE:**
(Newspaper, TV Station, Radio, etc.)

PERSON INTERVIEWED: Michael P. Halpin **TELEPHONE:** 850/921-9530

DIVISION/BUREAU/OFFICE: Air Res. Management/BAR/New Source Review

DATE OF INTERVIEW: 8/10/99 **ACTION TIME NEEDED:** N/A

QUESTIONS ASKED: Several questions were asked, which were emissions-related. Note – An Administrative Hearing is planned for this project on 8/30/99.

FOLLOW-UP NEEDED? I don't believe so.

DEADLINE:

SUMMARY OF CONVERSATION (Use additional pages if necessary)

Mr. Davis reached me twice – at approximately 3 PM and 8 PM (at my house). I indicated that I would be happy to call him back in the morning (from the office) so that I could be better prepared to answer his questions, but he stated that he had to get a story out tomorrow and requested that I assist him. He wanted me to review the emissions from the proposed Oleander facility with him, specifically NO_x, SO₂, PM₁₀ and CO, however we didn't make it to CO. I reminded Mr. Davis that I did not have any documents with me to refer to, was going from memory and requested that he keep that in mind when preparing his story.

He asked a general question attempting to obtain a comparison of this facility to similar facilities. I explained that "similar facilities" would likely be peaking electrical power plants and that therein, Oleander compared very favorably. He asked me why I said that, and I explained that one of the key pollutants that we look at from this type of facility is Nitrogen Oxides. This facility was planned to be permitted at 9 ppm of NO_x (while firing natural gas), which is excellent for a peaking facility. He asked me what was typical, and I offered something in the 12-25 ppm range. We had a lengthy discussion about BACT and I attempted to explain to Mr. Davis that my review of this facility was to determine what was Best Available Control Technology and to compare the facility to similar ones around the state and country. I explained the difference between a simple cycle configuration and a combined cycle configuration, noting that the pollution control technologies for a simple cycle plant were not as abundant as those for a combined cycle plant due to the rigorous duty which hotter flue gases entering the smoke stack place on the equipment. I stated that to my knowledge, the 9 ppm NO_x emission rate (firing Natural gas) proposed for this peaking facility was likely the best in Florida and one of the best in the

country. I also noted that we had recently issued permits for combined cycle facilities with equal and higher NO_x emission rates, even though they can typically do better than peaking units. He asked me about NO_x emissions while firing oil and I stated that they were proposed to be 42 ppm, which was typical. He asked what "the best" emission rates were and I indicated that with equipment known as a hot SCR, emission rates could be achieved less than 20 ppm. He asked why the facility did not use that technology, and I stated that our information concerning a plant in Puerto Rico (which was using the technology) was that the facility was having difficulties with the fuel oil combustion gases fouling the catalyst. Due to this and other factors, I did not believe that the technology was an appropriate requirement to place on this facility.

We discussed SO₂ and I related that the sulfur dioxide emissions are largely a function of the fuel going into the units. These units were planned to fire 3000 hours of natural gas with up to 1000 hours of that on fuel oil. I explained that the sulfur content of natural gas is nearly zero. Concerning the fuel oil proposed for this facility, the sulfur content is to be 0.05% or less. I noted that this was very low. He asked if other facilities were using lower sulfur-laden fuel oil and I indicated that 0.05% was about the best that can be done for power plant facilities. I explained that many facilities in the state were firing higher sulfur oils, as high as 2.5%, which is 50 times higher than what is being proposed for Oleander. He seemed surprised by this, but did not ask any questions about those facilities.

We then discussed particulate matter and I summarized it as being a very similar issue to SO₂ emissions. Notably, that natural gas is nearly free of PM₁₀ and that particulate matter in fuel oils roughly follows the sulfur content. With this project's clean fuel plans, it is reasonable to conclude that particulate emissions will be relatively low.

I was asked about any outside reviews of our work, and I stated that the EPA and National Park Service (NPS) had the opportunity to review the project. He asked me if they had any comments and I indicated that the only comment recommending anything "tighter" was from the NPS, who suggested that two similar facilities were permitted to fire fuel oil at 25 ppm. He asked why we didn't apply that technology to this project and I stated that my review of those two facilities revealed that the NPS had made an error. I found that both of those facilities were permitted at the same 42 ppm NO_x while firing fuel oil, which was being proposed for Oleander.

Mr. Davis began asking questions about the ambient air impacts. I stated that Mr. Cleveland Holladay (our meteorologist) had reviewed those issues and was better suited to answer those questions. Although I did not have Mr. Holladay's phone number with me, Mr. Davis could contact the switchboard and be connected.

Mr. Davis concluded the interview by asking me if I believed that this type of project was what was envisioned when the Clean Air Act was enacted. I commented that I'm probably not qualified to answer that question having not been involved in enacting the legislation. However, as a state regulator I can say that we are able to ensure that facilities being proposed today are much better (cleaner) than many existing facilities, which are operating in the state.

His return call was at 8 PM and he only asked about SO₂ and NO_x, wanting to know about the effects of those pollutants on the environment. I briefly discussed the relationship between NO_x and "smog" and SO₂ and acid rain.



Florida
Department of
Environmental Protection

To Oleander
File

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 10/15/99

TO: Marlene Waters

PHONE: ~~850~~

FAX: 407/268-3119

FROM: A. Linero

PHONE: 850/921-9523

Division of Air Resources Management

FAX: 850.922.6979

RE: Oleander

CC:

Total number of pages including cover sheet: 4

Message

It turned out that we don't have transcript yet, so I drove across town to get the pages from someone who has them. Here are the three pages from Zwolak that contain references to water. I didn't see "evaporation," but did see where excess is returned to City.

A. Linero

If there are any problems with this fax transmittal, please call the above phone number.

1 It is located in an area that is zoned for
2 industrial development, that is designated for both light and
3 heavy industrial use in the comprehensive plan, and it
4 provides a significant buffer not only because of the site
5 arrangement but the immediately adjacent off-site uses, it
6 provides a significant buffer to the closest residential
7 areas.

8 Q. Does this site have good characteristics for its
9 proposed use?

10 A. Yes, it's good -- excellent characteristics for
11 this proposed use.

12 Q. How will Oleander obtain water for the project's
13 needs?

14 A. The plan to supply water to the project comes from
15 a thorough evaluation of all the alternatives that were
16 investigated in the early part of 1998. What is proposed is
17 to utilize reclaimed water to the greatest extent practical.

18 And there would be an agreement between the City of
19 Cocoa and the Applicant, Oleander Power, to supply that
20 reclaimed water.

21 Oleander intends to develop infrastructure in
22 concert with the City of Cocoa to supplement that reclaimed
23 water with a storm water supply. That would supplement
24 reclaimed water when it was not available.

25 Potable water would be used only as a last resort

1 if reclaimed water and storm water were not available.

2 Q. What would Oleander do with the waste water that's
3 generated on site?

4 A. The minimal amounts of storm water -- excuse me,
5 of waste water that would be generated on site would be
6 discharged back to the City of Cocoa.

7 Q. So there will be no discharges of industrial waste
8 water into the environment on this site?

9 A. That's correct.

10 Q. All right. Will there be a well installed on site
11 to obtain groundwater on site?

12 A. No, groundwater is not a source of makeup water for
13 the project.

14 Q. Do you know whether Oleander has offered to comply
15 with any conditions or limitations on the development of this
16 project?

17 A. Yes. There are a number of conditions and
18 limitations.

19 Q. You had mentioned a Stipulated Settlement Agreement
20 a few moments ago.

21 A. Yes.

22 Q. Does that document contain the conditions and
23 limitations you're referring to?

24 A. It does.

25 Q. And what kinds of conditions and limitations were

1 offered by Oleander?

2 A. The conditions that are identified in that
3 Stipulated Settlement Agreement include hours of operation,
4 hours of operation on fuel oil, limitations with respect to
5 truck traffic, limitations with respect to odor and vibration
6 and noise.

7 It also includes a requirement to assist the City
8 in developing the infrastructure that I just mentioned
9 regarding storm water as a supplement to the reclaimed water
10 supply.

11 Q. Why did Oleander offer to accept these restrictions
12 on its Plan of Development?

13 A. Well, they weren't required under the current Land
14 Development Code for Brevard County to limit their facility
15 in the manners that I just described. There have been a
16 number of studies that Golder has conducted since the
17 project's inception that showed that we could demonstrate
18 compliance with those types of conditions.

19 And because those conditions were a source of
20 concern to, to the local residents in the community, most of
21 those conditions were offered by Oleander as an incentive to
22 develop the project in a manner that is reasonable and
23 minimizes environmental impact.

24 Q. All right, sir.

25 A. As part of your work on this project, did you

If any person decides to appeal any decision made by the Building Code Administrators and Inspectors Board with respect to any matter considered at this meeting, he/she may need to ensure that a verbatim record of the proceedings is made, which will include the testimony and evidence upon which the appeal is to be based.

For further information, contact: Florida Building Code Administrators and Inspectors Board, 1940 North Monroe Street, Tallahassee, Florida 32399-2211.

Any persons requiring special accommodations at this meeting because of a disability or physical impairment should contact Stacey Merchant at the Building Code Administrators and Inspectors Board at least five calendar days prior to the meeting. If you are hearing or speech impaired, please call Stacey Merchant using the Florida dual party relay system which can be reached at 1(800)955-8770 (Voice) and 1(800)955-8771 (TDD).

DEPARTMENT OF ENVIRONMENTAL PROTECTION

The Florida Department of Environmental Protection, Division of Recreation and Parks announces a public workshop to which all persons are invited.

DATE AND TIME: Wednesday, March 3, 1999, 7:00 p.m. (EST)

PLACE: Dunedin Public Library, 223 Douglas Avenue, Dunedin, Florida 34598

PURPOSE: To receive comments regarding management and land uses for Honeymoon Island State Recreation Area prior to the development of a management plan for the park.

Special accommodations for persons with disabling conditions should be requested in writing at least 48 hours in advance of this meeting. Any request for special accommodations can be made by writing: Department of Environmental Protection, Division of Recreation and Parks, District 4, Administration, 1843 South Tamiami Trail, Osprey, Florida 34229.

The Department of Environmental Protection announces a public workshop to which all person are invited:

DATE AND TIME: March 3, 1999, 7:00 p.m.

PLACE: Brevard County Agricultural Center, 3695 Lake Drive, Cocoa, FL 32926

PURPOSE: To accept public comments and provide status of Department review regarding Oleander Power's Air Permit Application to construct five gas and oil-fired combustion turbines in Brevard County.

A copy of the agenda may be obtained by writing: Mr. Michael P. Halpin, Department of Environmental Protection, 2600 Blair Stone Rd., MS #5505, Tallahassee, Florida 32399 or by calling Ms. Kim Tober, (850)921-9533.

Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this workshop is asked to advise the agency at

least 48 hours before the workshop by contacting the Personnel Service Specialist in the Bureau of Personnel, (850)488-2996. If you are hearing or speech impaired, please contact the agency by calling 1(800)955-8771 (TDD).

The Department of Environmental Protection announces a public hearing of the Governor and Cabinet, sitting as the Power Plant Siting Board, to consider the Administrative Law Judge's Order of Adoption of the [Proposed] Finding of Fact, Conclusions of Law and Recommended Order in the case of the Kissimmee Utility Authority and Florida Municipal Power Agency Cane Island Power Park, Power Plant Siting Application PA98-38, DOAH Case No. 98-3619EPP.

DATE AND TIME: March 9, 1999, 9:30 a.m.

PLACE: Cabinet Hearing Room, Lower Level, State Capitol, Tallahassee, Florida

PURPOSE: The Governor and Cabinet, sitting as the Power Plant Siting Board, will consider, pursuant to the Florida Electrical Power Plant Siting Act, Section 403.501, et seq., Florida Statutes, the Order of Adoption dated December 8, 1998, from the Administrative Law Judge, finding that the Kissimmee Utility Authority's and Florida Municipal Power Agency's Cane Island Power Park is in compliance with existing land use plans and zoning ordinances.

For a copy of the agenda please contact: Judy Brooks, Department of Environmental Protection, Marjory Stoneman Douglas Building, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, (850)922-3766.

CABINET AIDES BRIEFING: The Cabinet Aides will meet and discuss the item on March 3, 1999, 9:00 a.m., in the same location.

The purpose of the briefing is to review and gather information regarding this item for consideration by the Siting Board.

The Department of Environmental Protection announces a (public meeting, hearing or workshop) to which all person are invited:

DATE AND TIME: March 9, 1999, 6:00 p.m.

PLACE: Rm. 502, 160 Governmental Center, Pensacola, Florida 32501

PURPOSE: The Northwest Citizens Advisory Panel meeting will include a presentation by our Northwest District Submerged Lands and Environmental Resources Permit staff about wetlands mitigation.

A copy of the agenda may be obtained by writing: Department of Environmental Protection, 160 Governmental Center, Pensacola, Florida 32501 or by calling Dick Fancher, (850)595-8300.

Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this workshop/hearing/meeting is asked to advise the agency at least 48 hours before the workshop/hearing/

NOTICE

The Department of Environmental Protection, Division of Air Resources Management, announces a public workshop (40 CFR 51.102 hearing) to which all persons are invited.

DATE AND TIME: March 3, 1999 at 7:00pm

PLACE: Brevard County Agricultural Center, 3695 Lake Drive,
Cocoa, FL 32926

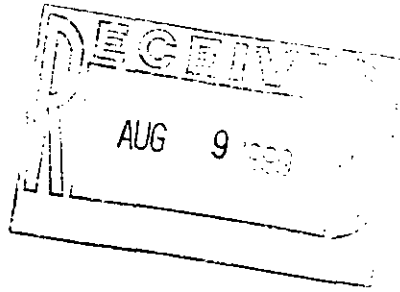
PURPOSE: Oleander Power Project Air Permit Application

A copy of the workshop agenda and proposed amendments may be obtained by writing to Mr. Michael P. Halpin, Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400 or by calling Ms. Kim Tober at (850)921-9533. These materials will also be available for public inspection during normal business hours at the following offices:

Department Of Environmental Protection
Central Florida District
Air Resources
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Orange County Environmental Protection Department
Air Program Section
2002 East Michigan Street
Orlando, Florida 32806

All persons desiring to be heard on the proposed agency action will be given the opportunity to do so. Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this meeting is asked to advise the agency at least 48 hours before the meeting by contacting the Personnel Services Specialist at (850)488-2996. If you are hearing or speech impaired, please contact the agency by calling (800)955-8771 (TDD).



DSD

August 6, 1999

Mr. Daniel Manry
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, FL 32399-3060

FAX to
Rick W.
Armen S.
Frank S.
Richard Z.
Doug B.
- Leonard Spicknagel
" Al King
F.Y.I.
David Dee

Dear Judge Manry:

This is in regard to Case No. 99-2581, Clarence Rowe, Petitioner.

First, I have two questions regarding the hearing:

1. Is the hearing open to the public?
2. Can a person from the general public introduce testimony before the judge? If yes, how do they go about arranging this?

Second, I request a VHS tape playback system be available in the hearing room. I will be presenting video-taped evidence.

Third, I request that Mr. Richard L. Wolfinger, Vice President, Oleander Power Project be subpoenaed as a witness. I plan on questioning Mr. Wolfinger in support of my case.

Yours truly,

Clarence Rowe

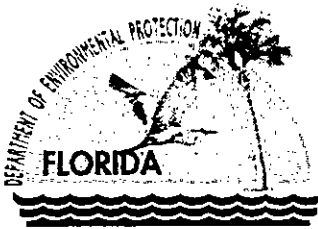
Copy to:

David Dee, Esquire
Landers & Parsons, P.A.
Post Office Box 271
Tallahassee, FL 32302-0271

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AUG 13 1999

BUREAU OF AIR REGULATION



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

February 27, 1999

Mr. Clarence Rowe
418 Pennsylvania Avenue
Rockledge, Florida 32955

Dear Mr. Rowe:

Thank you for your letter dated February 1 regarding the Oleander Power permit application and your calls following it up. Your letter asked that we consider your concerns and deny the permit. We are still considering the application and comments received to-date. We will determine shortly whether we intend to issue the permit and will publicly notice that decision. Thereafter, we will consider additional comments in making a final decision on the matter in several months.

We will provide the Public with our most up-to-date information at the meeting scheduled on March 3. Attached is the agenda. The meeting was noticed in the Orlando Sentinel (Brevard Edition) and the Florida Administrative Weekly. We also informed those individuals and County officials who asked to be advised of developments regarding the application.

Attached is the information you requested regarding emissions from existing and planned power plants in Brevard County. Interestingly, the proposed plant has about the same capacity as each of the existing plants. However the maximum annual emissions possible from the proposed Oleander facility are much lower than the actual emissions from the existing three plants. We expect the actual emissions from the Oleander Plant (if permitted) to be substantially less than the maximum values given for that proposed plant just as the existing plants actually emit much less total pollution than allowed.

As we discussed, this project will not undergo a "Need Determination" by the Public Service Commission or "Site Certification" by the Governor and Cabinet in accordance with Sections 403.501-518 of the Florida Statutes. These are required for projects that produce electrical energy from steam. The power generated from the Oleander Project derives from direct conversion of mechanical energy from the gas turbines to electrical power without undergoing a steam cycle.

Our review will be largely based on the ambient air quality effects of the project and our rule requirement to make a determination of the "Best Available Control Technology" for it. I understand Brevard County passed a moratorium on construction of power plants until the local Code of Ordinances is amended. They will take public input on the matter. We do not have an "Environmental Fairness" criterion (such as you mentioned in your letter) in the governing statutes and rules that allows us to deny air permits on that basis. However we are appreciative of the issue and forwarded your letter to our Office of General Counsel to research the matter in more detail and provide us a more precise opinion.

If you have any further questions regarding this project, please contact Mike Halpin at 850/921-9530. Feel free to submit additional questions and comments at the meeting on March 3.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/aal

Enclosures

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

MEETING AGENDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION
7:00 pm - 9:00pm MARCH 3, 1999
BREVARD COUNTY AGRICULTURAL CENTER
THIS MEETING IS OPEN TO THE PUBLIC

1. Introduction Vivian Garfein, Director, FDEP Central District
2. Public Participation Process Douglas Beason, OGC.
3. Application Details Michael P. Halpin
4. Ambient Air Impact/Modeling Cleveland G. Holladay
5. Public Comments
6. Adjourn

Regional comparison of power plant annual emissions (1997)

<u>Poll.</u>	<u>OUC-IR</u> (959 MW)	<u>FPL-CC</u> (804 MW)	<u>OUC-ST</u> (925 MW)	<u>OLNDR</u> (950 MW)
NO _x	7925	7984	9257	1597
PM	173	943	253	208
SO ₂	23058	17632	8994	415
CO	1170	587	595	704
VOC	178	49	72	94

Notes: 1) Emissions shown are “reported actuals” for the OUC and FPL sites. These are being related to Oleander’s “requested maximum” emission levels for comparison purposes only.

2) Above power plants represent dissimilar technologies and fuel types.

AIRS ID: 0090006 # of Emissions Unit: 2
 Owner: FLORIDA POWER & LIGHT/CP. CAN.
 Name: CAPE CANAVERAL POWER PLANT
 City: COCOA Office: CD County: BREVARD
 Status: A Compliance Tracking Code: A DFC: 14-APR-98
 Type: STEAM ELECTRIC PLANT
 SIC: 4911 PSD: N PPS: N NSPS: NESHAP:
 Title V Source: Y Syn Non-Title V Source: Small Business Stationary:
 Major of HAPS: Major of Non-HAP Pollutants: Y
 Syn Minor of HAPS: Syn Minor of Non-HAP Pollutants:

Pollutant	Poten(TPY)	Cap(TPY)	1997	1996
			Actual(TPY)	Actual(TPY)
CO	1127.6000		586.6000	595.6200
NOX	15346.0000		7983.5000	8085.7600
PB	0.6000		0.0000	
PM	3383.0000		943.4300	1171.8400
PM10	2572.0000		943.4300	1171.8400
SO2	93043.0000		17631.5400	18947.8500
VOC	162.5000		48.9200	55.8700

DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR RESOURCES MANAGEMENT SYSTEM

AIRS ID: 0090008 # of Emissions Unit: 8
 Owner: ORLANDO UTILITY COMMISSION
 Name: INDIAN RIVER PLANT
 City: TITUSVILLE Office: CD County: BREVARD
 Status: A Compliance Tracking Code: A DFC: 25-FEB-98
 Type: STEAM ELECTRIC PLANT
 SIC: 4911 PSD: Y PPS: N NSPS: Y NESHAP:
 Title V Source: Y Syn Non-Title V Source: Small Business Stationary:
 Major of HAPS: Major of Non-HAP Pollutants: Y
 Syn Minor of HAPS: Syn Minor of Non-HAP Pollutants:

Pollutant	Poten(TPY)	Cap(TPY)	1997	1996
			Actual(TPY)	Actual(TPY)
CO	1231.5000		1170.5100	402.4400
H021	0.0020		7.5000	1.4500
NOX	9141.7000		7923.8200	1896.7600
PB	0.1405		145.9800	64.7800
PM	3086.0020		251.8800	175.8800
PM10	1118.4000		173.8500	122.4500
SAM	176.0000		0.3700	0.0200
SO2	73188.0000		23059.0000	1468.2600
VOC	386.4200		177.8500	30.2400

DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR RESOURCES MANAGEMENT SYSTEM

AIRS ID: 0950137 # of Emissions Unit: 2
 Owner: ORLANDO UTILITIES COMMISSION
 Name: STANTON ENERGY CENTER
 City: ORLANDO Office: CD County: ORANGE
 Status: A Compliance Tracking Code: A DFC: 15-JAN-97
 Type: STEAM ELECTRIC PLANT
 SIC: 4911 PSD: Y PPS: Y NSPS: Y NESHAP:
 Title V Source: Y Syn Non-Title V Source: Small Business Stationary:
 Major of HAPS: Major of Non-HAP Pollutants: Y
 Syn Minor of HAPS: Syn Minor of Non-HAP Pollutants:

Pollutant	Poten(TPY)	Cap(TPY)	1997	1996
			Actual(TPY)	Actual(TPY)
CO	3233.9000		595.4900	464.1600
NOX	14060.3500		9256.1000	7248.1000
PB	1.0800		222.3100	0.2400
PM	918.4500		403.6000	337.7700
PM10	576.4500		252.4800	211.2900
SO2	26432.1700		8994.6000	6274.0000
VOC	351.2600		71.5900	55.8100

418 Pennsylvania Avenue
Rockledge, Florida 32955
1 February 1999

RECEIVED

FFB 05 1999

BUREAU OF
AIR REGULATION

C. H. Fancy, Chief
Bureau of Air Regulations
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Oleander Power Project:
Brevard County, Florida

Dear Mr. C. H. Fancy:

The Oleander Power project proposed by Mr. R. L. Wolfinger of Baltimore, Maryland is of great concern to residents of Brevard County. We understand your department is in the permit review process for this project and we would appreciate you taking into consideration some of our concerns.

Brevard County already has two power plants within approximately eight miles of this proposed site. Under the concept of environmental fairness Brevard already has adequate pollution without adding the Oleander plant. Fortunately NASA launch fallout is mostly offshore, however, FPL and Orlando Utilities lay down considerable visible plume on shore. Oleander's site location will deposit most of the fallout across residential neighborhoods then into the St. Johns or Indian river. During NE/SW flow the Oleander and FPL plant will have overlapping plume patterns increasing concentrations of fallout.

Were there a compelling need in Brevard County for this plant we could better understand the location; however, lacking a compelling need this appears to be a crass commercial venture foisted upon a low-income community because they are without political muscle to prevent the act. Again, under the concept of environmental fairness you are requested to deny any permit for the Oleander Power Plant.

Sincerely,



Clarence Rowe

CR:r