



RECEIVED

JUL 24 2007

BUREAU OF AIR REGULATION

July 23, 2007

Mr. Alvero A. Linero, Program Administrator
Bureau of Air Regulation, South Permitting Section
111 South Magnolia Street
Tallahassee, FL 32399

Re: **FPL Glades Power Park**
PSD Permit Application, FDEP file # 0430017-001-AC, (# PSD-FL-385)
Permit Application Withdrawal

Dear Mr. Linero:

In response to the Florida Public Service Commission's June 5, 2007 vote to deny the need for the FPL Glades Power Park, FPL has decided to withdraw the Site Certification Application and all associated permit applications. We hereby withdraw the PSD Air Permit Application.

I wanted to take a minute to personally thank you and your staff who contributed significant time and effort in reviewing the application and working with the various reviewing agencies on this very complicated project.

If you need anything from us to help you close out this project, please do not hesitate to contact me at 561 691-7518. I am certain that we will have the opportunity to work together with you again in the future on other interesting endeavors. I look forward to that.

Sincerely,

A handwritten signature in cursive script that reads "Barbara P. Linkiewicz".

Barbara P. Linkiewicz
Director of Environmental Licensing

cc: Mr. Michael Halpin, FDEP Siting Office



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 1, 2007

Mr. Stuart K. Whiddon, Sherriff
Glades County Sherriff's Office
Post Office Box 39
Moore Haven, Florida 33471

Dear Mr. Whiddon:

Thank you for your assistance with the Department of Environmental Protection's April 24, 2007 meeting regarding Florida Power and Light's pending air construction permit application for a coal fired electric power plant. We appreciate the assistance of you and your deputies in making this meeting a success. Your deputies were courteous, professional and very quick to handle the incident that arose at the end of the meeting.

Sincerely,

A handwritten signature in cursive script that reads "Trina L. Vielhauer".

Trina L. Vielhauer, Chief
Bureau of Air Regulation

cc: Chief Deputy Pottorff



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 1, 2007

Ms. Jean Prowant, Principal
Moore Haven Jr. / Sr. High School
700 Terrier Pride Drive S.W.
Post Office Box 99
Moore Haven, Florida 33471

Dear Ms. Prowant:

Thank you for your assistance with the Department of Environmental Protection's April 24, 2007 meeting regarding Florida Power and Light's pending air construction permit application for a coal fired electric power plant. We appreciate the assistance of you and your staff in making this meeting a success.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

cc: Ms. Lori Bond



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 1, 2007

Mr. Wayne Aldrich, Superintendent
Glades County School Board
400 10th Street S.W.
Post Office Box 459
Moore Haven, Florida 33471

Dear Mr. Aldrich:

Thank you for your assistance with the Department of Environmental Protection's April 24, 2007 meeting regarding Florida Power and Light's pending air construction permit application for a coal fired electric power plant. We appreciate the assistance of you and your staff in making this meeting a success.

Sincerely,

A handwritten signature in cursive script that reads "Trina L. Vielhauer".

Trina L. Vielhauer, Chief
Bureau of Air Regulation

cc: Ms. Lisa Randolph



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 1, 2007

Mr. Jon Iglehart, Director
South District Office
Department of Environmental Protection
Post Office Box 2549
Ft. Myers, FL 33902-2549

Dear Jon:

I cannot thank you and your staff enough for your assistance with the April 24th meeting in Glades County. We could not have conducted this event without the help of you and your staff. You all are great!

Thanks again,

A handwritten signature in black ink, appearing to read "Trina".

Trina Vielhauer

cc: Audrey Wright, Sherrill Culliver and Charles Emery



United States Department of the Interior
NATIONAL PARK SERVICE



Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034

In Reply Refer to:

N3615

January 18, 2007

A.A. Linero, Program Administrator
Department for Environmental Protection
Permitting South Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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JAN 26 2007

BUREAU OF AIR REGULATION

Dear Mr. Linero:

We have reviewed the Florida Power & Light (FPL) Prevention of Significant Deterioration (PSD) permit application for the Glades Power Park (GPP) located in Glades County, Florida. The proposed GPP facility would be located approximately 113 kilometers north of Everglades National Park, a Class I air quality area administered by the National Park Service (NPS). The facility would also be located approximately 65 kilometers north of Big Cypress National Preserve and approximately 160 kilometers northwest of Biscayne National Park, both Class II areas administered by the NPS. The facility will be a 1,960 megawatt power plant consisting of two pulverized coal-fired boilers which will burn a blend of coal and petroleum coke. According to the FPL PSD permit application, the GPP facility will emit a total of 3,811 tons per year (TPY) of nitrogen oxide (NO_x), 3,049 TPY of sulfur dioxide (SO₂), 1,281 TPY of total particulate matter (PM), 1,022 TPY of particulate matter less than 10 microns (PM₁₀), 305 TPY of sulfuric acid mist (H₂SO₄), and 260 TPY of volatile organic compounds.

Based on our initial review of the GPP permit application, we find it does not include all of the information we need to assess potential impacts from GPP emissions on sensitive resources at Everglades National Park. We have the following comments concerning the permit application.

PSD Increment and Visibility Concerns

The air quality modeling files and the permit application we received on January 4, 2007, show that FPL based its visibility impacts and 3-hr and 24-hr increment consumption analyses on 30-day rolling average emission rates. FPL used emission rates of 696 lb/hr for SO₂, 870 lb/hr for NO_x, 226 lb/hr for speciated PM₁₀ and 69.6 lb/hr for H₂SO₄ in these analyses. These rates are only applicable for the annual increments and acid deposition impacts analyses. Therefore, FPL's visibility impacts analyses for Everglades National Park and its short-term Class I and Class II increment analyses (i.e., the 3-hour and 24-hour SO₂ and 24-hour PM₁₀ averaging periods) are incorrect. Thus, FPL should redo its short-term Class I and Class II

increment analyses and its visibility impact analysis (including both filterable and condensable PM) using the correct 3-hour and 24-hour emission rates. Also, if the Class I Significant Impact Levels are exceeded, FPL should perform cumulative Class I increment impact analyses using the correct 3-hour and 24-hour emission limits. If a cumulative Class I impact analysis is completed, we ask that FPL provide information as to how the cumulative increment analyses were conducted. FPL should provide a discussion of the methods used to determine which sources were included in the cumulative inventory, and how it determined changes in emissions from those sources relative to baseline emissions. We also ask that FPL provide us example calculations for the more significant sources. Spreadsheets (in Excel format) should be provided containing the sources in the inventory, their distances from Everglades National Park, and their changes in emissions. In conclusion, based on the incorrect Class I and Class II air quality and visibility analyses in the FPL permit application, the NPS cannot determine the frequency, magnitude and extent of the visibility impacts at Everglades National Park, nor the amount of Class I increment consumed in the park. We ask that FDEP require FPL to conduct these analyses and include them in the GPP permit application.

Sulfate Deposition and Mercury Concerns

Mercury contamination of fish and wildlife is widespread throughout Everglades National Park. Emissions from the GPP facility will increase mercury deposition to the area, increasing the risk of toxic effects to both humans and wildlife. In addition, the modeling analysis for the facility predicts an increase in sulfate deposition to Everglades National Park. Increased sulfate deposition will likely increase methylation of mercury in sediments, with subsequent increased methylmercury bioaccumulation in the food web.

Therefore, we would like FPL to evaluate the impact of increased mercury and sulfate deposition on mercury methylation and subsequent mercury bioaccumulation in Everglades National Park. In addition, we would like FPL to mitigate mercury and sulfate deposition so that mercury methylation and accumulation potential is minimized.

Threatened and Endangered Species Concerns

We are also concerned about the potential effects of GPP emissions on threatened and endangered plants and wildlife protected by the Federal Endangered Species Act. Information regarding threatened and endangered species effects will be pertinent to federal actions or approvals needed before GPP is permitted or commences construction. In order to avoid delays, it may be prudent for FPL to examine potential effects on threatened and endangered species as soon as practical.

Best Available Control Technology (BACT)

Because the short-term (3-hour and 24-hour average) emissions rates are not specified for SO₂ and NO_x, and the averaging period for H₂SO₄ is not identified, we can not properly compare

the level of emission control (BACT analysis) to similar facilities that do have appropriate short-term limits. We ask FPL to provide this information in its permit application.

Conclusion

We are concerned that emissions from the proposed GPP facility will cause or contribute to a change in the air quality in Everglades National Park. Specifically, the emissions from the GPP facility have the potential to impact air quality and cause visibility impairment in Everglades National Park. We are also concerned that emissions from the GPP facility have the potential to exacerbate methylmercury conditions and to affect threatened and endangered species.

We ask that you require FPL to redo the air quality modeling analyses and to provide the requested additional information on BACT before deeming the permit application complete. We also ask that you allow us sufficient time to review this and all other relevant information in accordance with the Federal Land Manager notification requirements in 40 CFR 51.307. With the requested information and analyses, we will be in a better position to assess the air quality impacts on sensitive resources at Everglades National Park.

Thank you for involving us in the review of GPP's PSD permit application. Please do not hesitate to contact Mr. Dee Morse of our Air Resources Division in Denver (303-969-2817) or me (305-242-7712) if you have any questions concerning the comments provided above.

Sincerely,

A handwritten signature in black ink that reads "Dan B. Kimball". The signature is written in a cursive style with a period at the end.

Dan B. Kimball
Superintendent



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blirstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary - Designee

January 18, 2007

SENT BY ELECTRONIC MAIL – RECEIVED RECEIPT REQUESTED

Mr. Randall R. LaBauve, Vice President
Environmental Services Department
Florida Power and Light Company (FPL)
700 Universe Avenue
Juno Beach, Florida 33408

Re: DEP File No. 0430017-001-AC (PSD-FL-385)
FPL Glades Power Park
Nominal 1,960 megawatt (MW) Solid Fuel-fired Power Plant

Dear Mr. LaBauve:

On December 19, 2006 we received your application for an Air Construction Permit pursuant to the Rules for the Prevention of Significant Deterioration (PSD Permit) to construct a solid fuel-fired power plant in the vicinity of Moore Haven, Glades County.

Pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Refer to the attached letter from the Federal Land Manager (Superintendent, Everglades and Dry Tortugas National Parks). The Department requires the same information as detailed therein. Also please document the contacts and consultations to-date about this project with the Vero Beach office of the U.S. Fish and Wildlife Service related to endangered species on site and in the environs of the proposed site.
2. General Electric and Conoco Phillips have described bituminous coal reference plants for Integrated Gasification and Combined Cycle (IGCC) units characterized by very low emissions. For example, the claimed emission values are 0.01 pounds per million Btu of heat input (lb/mmBtu) for sulfur dioxide (SO₂) and 0.02 lb/mmBtu for nitrogen oxides (NO_x). The assumptions for these cases are deep sulfur removal and selective catalytic reduction (SCR) to control emissions of SO₂ and NO_x. The provider's descriptions are available at:
www.gasification.org/Docs/2005_Papers/29KEEL.pdf and
www.iea-coal.org.uk/publishor/system/component_view.asp?LogDocId=81264&PhyDocId=5653

Please provide documentation of FPL's review of IGCC.

[Rule 62-210.200, F.A.C. (Definitions-BACT); Rule 62-212.400, F.A.C. (PSD and BACT)]

3. Are there future phases planned for the facility?
4. Very little information is provided regarding the characteristics of the air pollution control equipment in terms of vessel sizes, reagent use estimates, air to cloth ratios, electrostatic precipitator capacities (ESP fields), etc. Please update the information in the application with the most recent information available to FPL based on the present status of front end engineering design (FEED).
[Rule 62-210.070, F.A.C. (Standards for Issuing or Denying Permits)]
5. Please update the status of the mercury (Hg) control equipment design. Advise whether FPL will actually install another electrostatic precipitator (ESP) in front of the sorbent injection equipment and fabric filter. [Rule 62-070, F.A.C.]
6. Clarify the thermal cycle efficiency of the units given their designation as ultracritical pulverized coal units. The literature typically describes such technologies as capable of yielding efficiencies greater than 40 percent (%). Describe the basis for the efficiency estimate (e.g. net, higher heating value, semi-tropical conditions, etc.).
7. Include a mass balance calculation including a simplified process flow diagram depicting the approximate average Hg flows in and out of the process steps. The flows should include: Hg in the incoming fuel; the amount exiting via the ESP fly ash; the amount captured by sorbent injection and fabric filtration; the amount removed by the wet scrubber; and the amount exiting the stacks. Also describe any discharges via scrubber effluent to treatment or disposal.
8. According to the application, emissions of volatile organic compounds (VOC) are estimated to be 260 tons per year (TPY). Estimated emissions of NO_x are approximately 3,800 TPY. Please provide conduct an ambient impact analysis for ozone including the gathering of ambient air quality data.
[Rule 62-212(2)(e)1.e., F.A.C.; 40 CFR 52.21(i)(5)(i)(footnote 1)(July 1)]
9. The maximum ambient concentrations predicted at ground level in Table 6-7 are all based on a single emission rate per pollutant irrespective of applicable averaging times. This analysis should be redone using the maximum emission values that will occur during the specified averaging times (i.e. 3-hour, 24-hour, annual, etc. as applicable) The information provided is insufficient to conclude that ambient monitoring is not required for the pollutants and related averaging times given in Rule 62-212.400, F.A.C. or in 40 CFR 60 52.21(m).

Please identify or evaluate locations near the proposed facility for a fully equipped ambient air monitoring station.
10. Compare the emission rates for the proposed project those proposed for the 1500 megawatt Sithe Desert Rock Energy Facility. Provide comparisons on same averaging times, e.g. 24-hour SO₂ and 24-hour NO_x. This can be done in terms of pounds per megawatt-hr (lb/MWH) to take advantage of the high efficiency characteristics of the Glades Project. The permit is available at:

www.epa.gov/region09/air/permit/desertrock/desert-rock-proposed-permit.pdf

[Rule 62-212.400, F.A.C. (BACT)]

11. Review the possibilities of lower carbon monoxide (CO), hydrogen fluoride (HF) and sulfuric acid mist (SAM) emissions. For example review CO requirements for the Desert Rock project as well as the Seminole Electric Unit 3 project. The planned use of the wet scrubber and wet electrostatic precipitator (WESP) should greatly decrease HF and SAM emissions. [62-212.400, F.A.C. (BACT)]
12. Evaluate the possibility of lower PM₁₀ emissions based on the additional ESP under consideration for installation prior to the sorbent injection/fabric filter equipment. Also provide a set of PM, PM₁₀ and PM_{2.5} limitations based on filterable and condensable fractions. Compare to the extent possible with the values for the Desert Rock project.
13. Review the possibility of particulate continuous emissions monitoring systems (PM-CEMS).
14. Provide estimates of ammonia (NH₃) emissions and strategies to minimize slip and fine particulate formation potential. What kind of ammonia is proposed to be used (aqueous or anhydrous)? What safety measures will be in place for the transportation and storage?
15. Provide information comparing the Hg emissions from the proposed project with stationary source information from other emitters of Hg in South Florida. Estimate the relative contribution and increase of the proposed project to the total Hg emissions from substantial stationary sources of Hg such as waste to energy plants, other power plants, etc.
16. Indicate measures that will be taken to insure that Hg removed by the various air pollution control processes and discharged via the coal combustion by-products, scrubber effluents, etc. does not reenter the environment.
17. Please provide more information regarding air emissions during the construction phase of the proposed project, including number and types of vehicles, description of heavy equipment, etc. Describe the measures to minimize the effects of construction activities at the site.
18. Is there a plan to minimize construction and transportation equipment emissions by using ultra low-sulfur diesel fuel and minimizing idling?
19. Please provide more information regarding the types of vehicles and equipment used during operation of the proposed facility. Will there be a commitment to minimizing pollution by reducing idling and utilizing the use of ultra low sulfur fuel? Further, provide a detailed assessment of all traffic, including vehicle used, purpose of vehicle and miles traveled.
20. Describe the purpose and duration and emission characteristics of the batch plant shown in Figure 2-1 of the application.
21. Please expand the narrative description of the process, the coal handling system, limestone and reagent preparation system, and the fly and bottom ash handling system (include each emissions point).
22. What activities are contemplated for the train/engine repair location? Are there any emissions associated with this activity?

23. The application listed petroleum coke and U.S. and imported bituminous coal. It states (page 2-1) that the units will co-fire up to 20 percent by weight petroleum coke with coals and that the amounts of each type will vary depending of economic conditions. What combination of fuels was used to calculate emissions? What is the worst case scenario?
24. Please identify the likely sources of the various fuels (coal and petcoke) mentioned in the application.
25. The BACT proposal for NO_x is stated as Advanced Combustion Technology (ACT) and SCR. Is the ACT a combination of low NO_x burners, overfire air or reburn or any other technology? Please explain.
26. Provide the protocol for the start up and shutdown to minimize emissions and quantify emissions during this period.
27. Provide estimates of and any considerations given to carbon dioxide emissions. Advise of any studies or pilot demonstration projects in which FPL participates or plans to participate.
28. Please evaluate and provide information regarding the feasibility of dry cooling techniques versus mechanical draft cooling towers with drift eliminators.
29. Please total up the hazardous air pollutants (HAPs) estimated for the project.
30. What are the distances between the proposed project and the following geographical features and municipalities: the City of Moore Haven; Clewiston; Lake Okeechobee; Brighton Seminole Reservation; Everglades National Park; and Big Cypress National Preserve? Show these relationships on a map.
31. In general, the results of the ambient air quality analyses should be displayed in more reader-friendly graphical formats on maps that include geographic features and municipalities to allow a better appreciation of the degree to which they are affected by the proposed project. This will make the subject matter more readily understandable to all readers including experts and laymen.
32. Section 6.5 of the PSD Report states that the land use data of the Ft. Myers National Weather Service station was compared to the land use of the proposed project site. It also states that this comparison found that land use values were similar between the Ft. Myers station and the project site. Please provide these data to the Department for verification purposes.
33. The proposed project is PSD for VOC and NO_x, which are precursors to the pollutant ozone. In the PSD Report, impacts from the proposed project with regards to ozone are solely evaluated with respect to vegetation, specifically in the Class I areas. VOC emissions in excess of 100 TPY require an ambient air quality analysis for ozone. Please submit an ambient air quality analysis for ozone.
34. The proposed project triggers PSD for Total Fluorides. There are modeled concentrations for HF impacts listed in Table 6-7 of the PSD Report. Please provide additional information regarding the impact of Total Fluorides. For example, how would a 24-hour concentration of 0.028 micrograms per cubic meter impact the surrounding Class II area?
35. Table 6-7 in the PSD Report shows the emission rates used in the modeling analyses for the proposed project. The long term emission rates are equal to the short term emission rates.

- The modeling analyses should reflect the worst case scenario. Please model all short term impacts using short term emission rates (i.e. the highest 24-hour emission rate, not 30 day average, for the 24-hour averaging period) for the Class I and Class II areas. Please submit all new modeling to the Department, including a Preconstruction Monitoring Analysis, a Significant Impact and Increment Analysis for all short-term averaging periods.
36. The CALPUFF modeling system was used to model impacts from the proposed project for the Class I areas. However, there are various versions of the model. The VISTAS version was used in the analysis for the Glades Power Park. While this version is accepted for use by the National Park Service, the EPA requires the use of the "regulatory" version (available on the EPA web site) to model the Class I Significant Impact Analysis and Increment, if required. Please model using the preferred EPA version or submit necessary documentation to obtain approval for using the VISTAS version.
 37. Are the Results in Table 7-6 of the PSD Report for Method 6 results of modeling with the Initial or New IMPROVE equation?
 38. The PM modeling including fugitive emissions has stack diameter inputs of 42 feet while Table 2-3 in the PSD Report states that the diameter will be 30 feet. Please correct the modeling or the Table to reflect the correct diameter. The modeled diameter of the cooling tower cells and emission rates do not correspond with Table 2-4 as well.
 39. The PM modeling including fugitive emissions shows an Emission Factor for Wind Speed Emission Rate Variation of 1 for higher wind speeds for source ID AREA9WE, AREA2WE and BYPRODWE. Please explain.
 40. Please explain how the Initial Vertical Dimension was determined for the volume sources.
 41. Please provide further information regarding Railcar emissions. For example, emission source ID EP-45 includes railcar unloading, TP-3, according to Table A-2. However, Table A-3 shows railcar loading as TP-1, which is not a part of any emission points listed in Table A-2. Further, please explain which source ID's in the modeling analysis includes emissions listed in Table A-3.
 42. Please provide further information regarding the truck/bulldozer traffic emissions. Please provide the truck traffic source ID's used in the modeling analysis.
 43. Table A-4 in the PSD Report lists 2 inactive coal piles, F-14 and F -13. However, Table A-9 (page 1 of 3), states that F-14 is an active coal pile and Table A-9 (page 2 of 3) only has one inactive pile, F-13. Please clarify and note which Source ID is used in the modeling for these emissions.
 44. Table A-4 in the PSD Report includes all emissions for all bulldozers and front end loaders listed in Table A-10 except for Bottom Ash Handling F-76. Was F-76 accounted for in the material handling operation emissions?

45. Table 6-6 in the PSD Report lists the building dimensions used in the modeling analysis. The modeling shows 19 of the 22 listed in the table. The 3 missing are the Railcar Area, the Limestone Track Hopper and the second Coal Transfer House. Please add these buildings to the modeling analysis. Should the Administration, Warehouse and Maintenance buildings be added to the modeling analysis?
46. The receptor grids for the SO₂ and PM₁₀ Increment analyses have 450-500 receptors. The PM₁₀ analysis only has receptors along the fence-line. Please verify that receptors are placed in "areas," not just "points" of "significance."
47. Where in the stack will CEMS be placed? Where will stack sampling platforms be located?

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please advise the professional engineer to make sure he/she uses the correct seal in compliance with the applicable requirements of the Florida Board of Professional Engineers.

If there are any questions, please call me at 850-921-9523 or Debbie Nelson at 850/921-9537.

Sincerely,



Alvaro A. Linero, Program Administrator
Bureau of Air Regulation
South Permitting Section

AAL/al

cc: Jim Little, EPA Region 4: little.james@epamail.epa.gov
Dee Morse, NPS: dee_morse@nps.gov
Jon Iglehart, DEP SED: jon.iglehart@dep.state.fl.us
Ken Kosky, PE, Golder: kkosky@golder.com
Mike Halpin, DEP Siting: mike.halpin@dep.state.fl.us
Chair, Glades County BCC, attention Secretary: sbrown@gladesclerk.com
Mayor, City of Moore Haven, attention City Clerk: mbrantley@moorehaven.net
Manager, Glades County: wtaylor@myglades.com
Chairman, Seminole Tribal Council: mitchellcypress@semtribe.com
President, Seminole Tribe of Florida Board of Directors: mosceola1@semtribe.com
Kristin Henry, Sierra Club: kristin.henry@sierraclub.org
Monica K. Reimer, Earthjustice: mreimer@earthjustice.org
Preston T. Robertson, Florida Wildlife Federation: wildfed@aol.com



United States Department of the Interior
NATIONAL PARK SERVICE



Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034

In Reply Refer to:

N3615

January 18, 2007

A.A. Linero, Program Administrator
Department for Environmental Protection
Permitting South Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

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increment analyses and its visibility impact analysis (including both filterable and condensable PM) using the correct 3-hour and 24-hour emission rates. Also, if the Class I Significant Impact Levels are exceeded, FPL should perform cumulative Class I increment impact analyses using the correct 3-hour and 24-hour emission limits. If a cumulative Class I impact analysis is completed, we ask that FPL provide information as to how the cumulative increment analyses were conducted. FPL should provide a discussion of the methods used to determine which sources were included in the cumulative inventory, and how it determined changes in emissions from those sources relative to baseline emissions. We also ask that FPL provide us example calculations for the more significant sources. Spreadsheets (in Excel format) should be provided containing the sources in the inventory, their distances from Everglades National Park, and their changes in emissions. In conclusion, based on the incorrect Class I and Class II air quality and visibility analyses in the FPL permit application, the NPS cannot determine the frequency, magnitude and extent of the visibility impacts at Everglades National Park, nor the amount of Class I increment consumed in the park. We ask that FDEP require FPL to conduct these analyses and include them in the GPP permit application.

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Therefore, we would like FPL to evaluate the impact of increased mercury and sulfate deposition on mercury methylation and subsequent mercury bioaccumulation in Everglades National Park. In addition, we would like FPL to mitigate mercury and sulfate deposition so that mercury methylation and accumulation potential is minimized.

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the level of emission control (BACT analysis) to similar facilities that do have appropriate short-term limits. We ask FPL to provide this information in its permit application.

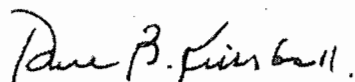
Conclusion

We are concerned that emissions from the proposed GPP facility will cause or contribute to a change in the air quality in Everglades National Park. Specifically, the emissions from the GPP facility have the potential to impact air quality and cause visibility impairment in Everglades National Park. We are also concerned that emissions from the GPP facility have the potential to exacerbate methylmercury conditions and to affect threatened and endangered species.

We ask that you require FPL to redo the air quality modeling analyses and to provide the requested additional information on BACT before deeming the permit application complete. We also ask that you allow us sufficient time to review this and all other relevant information in accordance with the Federal Land Manager notification requirements in 40 CFR 51.307. With the requested information and analyses, we will be in a better position to assess the air quality impacts on sensitive resources at Everglades National Park.

Thank you for involving us in the review of GPP's PSD permit application. Please do not hesitate to contact Mr. Dee Morse of our Air Resources Division in Denver (303-969-2817) or me (305-242-7712) if you have any questions concerning the comments provided above.

Sincerely,



Dan B. Kimball
Superintendent
Everglades and Dry Tortugas National Parks

Gibson, Victoria

From: Vielhauer, Trina
Sent: Friday, January 19, 2007 2:21 PM
To: Gibson, Victoria; Adams, Patty
Subject: FW: Notification Request for Future Actions regarding coal-fired power plants

Attachments: Notice for Air Permits.PDF



Notice for Air
Permits.PDF (30...

-----Original Message-----

From: Kristin.Henry@sierraclub.org [mailto:Kristin.Henry@sierraclub.org]
Sent: Tuesday, December 19, 2006 7:46 PM
To: Halpin, Mike; Koerner, Jeff; Vielhauer, Trina
Subject: Notification Request for Future Actions regarding coal-fired power plants

Dear Ms. Vielhauer, Mr. Halpin and Mr. Koerner,

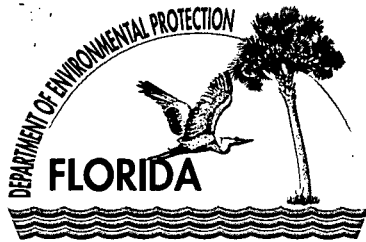
Please see the attached request for notification regarding future actions related to coal-fired power plants.

(See attached file: Notice for Air Permits.PDF)

Kristin Henry
Staff Attorney
Sierra Club
85 Second Street
San Francisco, CA 94105-3441
415.977.5716 phone
415.977.5793 fax
kristin.henry@sierraclub.org

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law as attorney-client and work-product confidential or otherwise confidential communications. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, immediately notify me at the telephone number above.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary-Designee

January 16, 2007

Ms. Monica K. Reimer, Esq.
Earthjustice
111 South Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301

Sent via email with received receipt requested: mreimer@earthjustice.org and dguest@earthjustice.org

RE: Notification Request

Dear Ms. Reimer:

We are in receipt of your letter dated January 8, 2007 regarding notifications of all future actions taken regarding power plants in Florida. We appreciate Earthjustice's interest in power plant permitting activities in Florida. We will add Earthjustice (c/o David Guest and Monica Reimer) to our mailing list for our recently received application for the Florida Power & Light Glades Power Park project. However, our statutes do not require nor our tracking systems allow us to track notification requests for as yet unsubmitted PSD applications or Site Certification projects. Upon issuance of any Department action, the applicant will publish notice in a newspaper of general circulation. Please contact our Office of General Counsel if you have questions regarding the petition or official comment period requirements.

The Department will be posting documents related to power plant Site Certification at the following websites:

Main Website for Siting Coordination Office:

<http://www.dep.state.fl.us/siting/default.htm>

Web Site for Power Plant Siting Overview:

http://www.dep.state.fl.us/siting/Programs/Power_Plant_Siting_Overview.htm

Web Site for Power Plant Applications in Process:

http://www.dep.state.fl.us/siting/Highlights/applications_in_process.htm

In addition, the Department's Division of Air Resource Management will be posting documents related to power plant PSD projects at the following websites:

Main Website for Division of Air Resource Management:

<http://www.dep.state.fl.us/Air/default.htm>

Web Site for New Source Review PSD Construction Permits:

<http://www.dep.state.fl.us/Air/permitting/construction.htm>

You can also email or telephone Mr. Linero, Mr. Koerner or Mr. Halpin to inquire about the status of power plant applications. Upon identification of a specific pending project the Florida Wildlife Federation is interested in, please email us your request to be notified of further actions on that pending project.

If you have any questions, please contact Mr. Linero or Mr. Koerner at 850/488-0114 or Mr. Halpin of the Siting Coordination Office at 850/245-8002. In addition, you may contact Ms. Robinette or Mr. Goorland in our Office of General Counsel at 850/245-2242.

Sincerely,



Trina L. Vielhauer

Email copies: Mr. Michael Halpin, Department's Siting Coordination Office
Mr. Scott Goorland, Department's Office of General Counsel
Ms. Rebecca Robinette, Department's Office of General Counsel
Mr. Jeff Koerner, Department's Division of Air Resource Management
Ms. Patty Adams, Department's Division of Air Resource Management
Mr. Al Linero, Department's Division of Air Resource Management

Gibson, Victoria

From: Monica Reimer [mreimer@earthjustice.org]
To: Gibson, Victoria
Sent: Tuesday, January 16, 2007 6:01 PM
Subject: Read: Notification Request

Your message

To: mreimer@earthjustice.org
Subject:

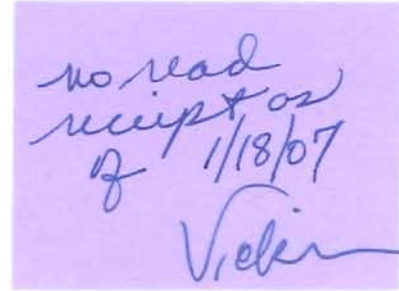
was read on 1/16/2007 6:01 PM.

Gibson, Victoria

From: Gibson, Victoria
Sent: Tuesday, January 16, 2007 5:16 PM
To: 'dquest@earthjustice.org'
Subject: FW: Notification Request

Importance: High

Attachments: Earthjustice Notification Letter.pdf



From: Gibson, Victoria
Sent: Tuesday, January 16, 2007 5:12 PM
To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Importance: High



Earthjustice
Notification Lett...

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached documents. This may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the documents.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicants, the engineering community, and the public. Please advise this office of any changes to your e-mail address.

Thank you,

DEP, Bureau of Air Regulation

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Halpin, Mike
To: Gibson, Victoria
Sent: Tuesday, January 16, 2007 5:52 PM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/16/2007 5:52 PM.

Gibson, Victoria

From: Goorland, Scott
To: Gibson, Victoria
Sent: Tuesday, January 16, 2007 5:45 PM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/16/2007 5:45 PM.

Gibson, Victoria

From: Robinette. Rebecca
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 2:33 PM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette. Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/17/2007 2:33 PM.

Gibson, Victoria

From: Koerner, Jeff
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 7:18 AM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/17/2007 7:18 AM.

Gibson, Victoria

From: Adams, Patty
To: Gibson, Victoria
Sent: Tuesday, January 16, 2007 5:23 PM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/16/2007 5:23 PM.

Gibson, Victoria

From: Linero, Alvaro
To: Gibson, Victoria
Sent: Tuesday, January 16, 2007 6:28 PM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/16/2007 6:28 PM.

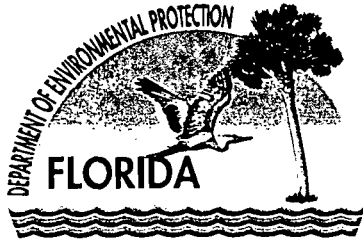
Gibson, Victoria

From: Vielhauer, Trina
To: Gibson, Victoria
Sent: Tuesday, January 16, 2007 5:39 PM
Subject: Read: Notification Request

Your message

To: 'mreimer@earthjustice.org'; 'dquest@earthjustice.org'
Cc: Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Linero, Alvaro; Adams, Patty; Vielhauer, Trina
Subject: Notification Request
Sent: 1/16/2007 5:12 PM

was read on 1/16/2007 5:39 PM.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary-Designee

January 16, 2007

Certified Mail -- Return Receipt Requested

Mr. Preston T. Robertson
Vice-President/General Counsel
Florida Wildlife Federation
2545 Blairstone Pines Drive
Tallahassee, Florida 32301

RE: Notification Request

Dear Mr. Robertson:

We are in receipt of your letter dated January 9, 2007 regarding notifications of all future actions taken regarding power plants in Florida. We appreciate Florida Wildlife Federation's interest in power plant permitting activities in Florida. We will add the Florida Wildlife Federation to our mailing list for our recently received application for the Florida Power & Light Glades Power Park project. However, our statutes do not require nor our tracking systems allow us to track notification requests for as yet unsubmitted PSD applications or Site Certification projects. Upon issuance of any Department action, the applicant will publish notice in a newspaper of general circulation. Please contact our Office of General Counsel if you have questions regarding the petition or official comment period requirements.

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<http://www.dep.state.fl.us/siting/default.htm>

Web Site for Power Plant Siting Overview:

http://www.dep.state.fl.us/siting/Programs/Power_Plant_Siting_Overview.htm

Web Site for Power Plant Applications in Process:

http://www.dep.state.fl.us/siting/Highlights/applications_in_process.htm

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Main Website for Division of Air Resource Management:

<http://www.dep.state.fl.us/Air/default.htm>

Web Site for New Source Review PSD Construction Permits:

<http://www.dep.state.fl.us/Air/permitting/construction.htm>

You can also email or telephone Mr. Koerner, Mr. Linero or Mr. Halpin to inquire about the status of power plant applications. Upon identification of a specific pending project the Florida Wildlife Federation is interested in, please email us your request to be notified of further actions on that pending project.

If you have any questions, please contact Mr. Linero or Mr. Koerner at 850/488-0114 or Mr. Halpin of the Site Certification Coordination Office at 850/245-8002. In addition, you may contact Ms. Robinette or Mr. Goorland in our Office of General Counsel at 850/245-2242.

Sincerely,



Trina L. Vielhauer

Email copies: Mr. Michael Halpin, Department's Siting Coordination Office
Mr. Scott Goorland, Department's Office of General Counsel
Ms. Rebecca Robinette, Department's Office of General Counsel
Mr. Jeff Koerner, Department's Division of Air Resource Management
Ms. Patty Adams, Department's Division of Air Resource Management
Mr. Al Linero, Department's Division of Air Resource Management

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee
1. Article Addressed to: Mr. Preston T. Robertson Vice President / General Counsel Florida Wildlife Federation 2545 Blairstone Pines Drive Tallahassee, FL 32301	B. Received by (Printed Name) <input checked="" type="checkbox"/> Agent C. Date of Delivery <input checked="" type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. 7006 2760 0005 4026 0195	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

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Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Preston T. Robertson
 Street, Apt. No.,
 or PO Box No. 2545 Blairstone Pines Dr.
 City, State, ZIP+4
 Tallahassee, FL 32301

PS Form 3800, August 2006 See Reverse for Instructions

7006 2760 0005 4026 0195

Gibson, Victoria

From: Halpin, Mike
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 3:58 PM
Subject: Read: Florida Wildlife Federation Notification Request

Your message

To: Robinette, Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request
Sent: 1/17/2007 3:54 PM

was read on 1/17/2007 3:58 PM.

Gibson, Victoria

From: Goorland, Scott
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 4:05 PM
Subject: Read: Florida Wildlife Federation Notification Request

Your message

To: Robinette, Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request
Sent: 1/17/2007 3:54 PM

was read on 1/17/2007 4:05 PM.

Gibson, Victoria

From: Robinette. Rebecca
To: Gibson, Victoria
Sent: Thursday, January 18, 2007 9:10 AM
Subject: Read: Florida Wildlife Federation Notification Request

Your message

To: Robinette. Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request
Sent: 1/17/2007 3:54 PM

was read on 1/18/2007 9:10 AM.

Gibson, Victoria

From: Koerner, Jeff
Sent: Thursday, January 18, 2007 3:30 PM
To: Gibson, Victoria
Subject: RE: Florida Wildlife Federation Notification Request

Jeff Koerner, BAR - Air Permitting North
Florida Department of Environmental Protection
850/921-9536

From: Gibson, Victoria
Sent: Wednesday, January 17, 2007 3:54 PM
To: Robinette, Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request

<< File: Florida Wildlife Federation Notification Letter.pdf >>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached documents. This may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the documents.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicants, the engineering community, and the public. Please advise this office of any changes to your e-mail address.

Thank you,

DEP, Bureau of Air Regulation

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Air Resource Management
victoria.gibson@dep.state.fl.us
850-921-9504 fax. 850-921-9533

Gibson, Victoria

From: Linero, Alvaro
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 8:04 PM
Subject: Read: Florida Wildlife Federation Notification Request

Your message

To: Robinette, Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request
Sent: 1/17/2007 3:54 PM

was read on 1/17/2007 8:04 PM.

Gibson, Victoria

From: Adams, Patty
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 4:35 PM
Subject: Read: Florida Wildlife Federation Notification Request

Your message

To: Robinette, Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request
Sent: 1/17/2007 3:54 PM

was read on 1/17/2007 4:35 PM.

Gibson, Victoria

From: Vielhauer, Trina
To: Gibson, Victoria
Sent: Wednesday, January 17, 2007 4:01 PM
Subject: Read: Florida Wildlife Federation Notification Request

Your message

To: Robinette, Rebecca; Goorland, Scott; Halpin, Mike; Koerner, Jeff; Linero, Alvaro; Adams, Patty
Cc: Vielhauer, Trina
Subject: Florida Wildlife Federation Notification Request
Sent: 1/17/2007 3:54 PM

was read on 1/17/2007 4:01 PM.

BEST AVAILABLE COPY

FLORIDA WILDLIFE FEDERATION

Affiliated With National Wildlife Federation

Manley K. Fuller, III, President
2545 Blairstone Pines Drive, Tallahassee, FL 32301
Post Office Box 6870, Tallahassee, FL 32314-6870

Phone: (850) 656-7113
Fax: (850) 942-4431
e-mail: wildfed@aol.com
website: www.flawildlife.org



VIA CERTIFIED MAIL

January 9, 2007

RECEIVED

JAN 10 2007

BUREAU OF AIR REGULATION

Trina Vielhauer, Bureau Chief
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Placement on Departmental Mailing List for All Notices of Agency Action Related to Application for Title V Air Permits or NSR/PSD Construction Permits for Power Plants to be Sited under the Power Plant Siting Act

Dear Ms. Vielhauer:

Pursuant to Section 120.60(3), Florida Statutes, please place the following person on the departmental mailing list for all notices of agency action related to applications for Title V Air Permits and New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permits for new power plants in the State of Florida that will be sited pursuant to the provisions of the Florida Power Plant Siting Act:

Preston T. Robertson, Esq.
Florida Wildlife Federation
2545 Blairstone Pines Dr.
Tallahassee, FL 32301

Thank you for your attention to this matter.

Cordially,

Preston T. Robertson
Vice-President/General Counsel



EARTHJUSTICE

BOZEMAN, MONTANA DENVER, COLORADO HONOLULU, HAWAII
INTERNATIONAL JUNEAU, ALASKA OAKLAND, CALIFORNIA
SEATTLE, WASHINGTON TALLAHASSEE, FLORIDA WASHINGTON, D.C.
ENVIRONMENTAL LAW CLINIC AT STANFORD UNIVERSITY

RECEIVED

JAN 10 2007

January 8, 2007

BUREAU OF AIR REGULATION

Trina Vielhauer, Bureau Chief
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

VIA CERTIFIED MAIL

Re: Placement On Departmental Mailing List For All Notices Of Agency Action
Related To Application For Title V Air Permits Or NSR/PSD Construction
Permits For Power Plants To Be Sited Under the Power Plant Siting Act

Dear Ms. Vielhauer:

Pursuant to Chapter 120.60(3), Florida Statutes, please place the following persons on the departmental mailing list for all notices of agency action related to applications for Title V Air Permits and New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permits for new power plants in the State of Florida that will be sited pursuant to the provisions of the Florida Power Plant Siting Act:

David G. Guest, Esq.
Earthjustice
111 South Martin Luther King, Jr. Boulevard
Tallahassee, Florida 32301
dguest@earthjustice.org

Monica K. Reimer, Esq.
Earthjustice
111 South Martin Luther King, Jr. Boulevard
Tallahassee, Florida 32301
mreimer@earthjustice.org

Thank you for your prompt attention to this request.

Sincerely,

Monica K. Reimer

MKR:hs

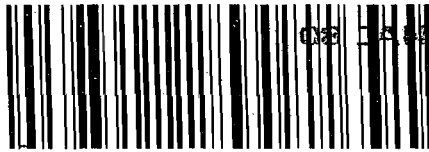


EARTHJUSTICE

111 S. MARTIN LUTHER KING JR. BLVD.
TALLAHASSEE, FL 32301

CERTIFIED MAIL

TALLAHASSEE FL 323



08 14 2007 PM 1 L

115
7280 \$00.39⁰ JAN 08 07
8478 MAILED FROM ZIP CODE 32301



7099 3400 0009 9825 0876

1-85

Trina Vielhauer, Bureau Chief
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

UNITED STATES POSTAGE
☆☆☆
167
7290 \$02.40⁰ JAN 08 07
8490 MAILED FROM ZIP CODE 32301

32399-2400



Gibson, Victoria

From: Kristin.Henry@sierraclub.org
Sent: Tuesday, January 02, 2007 5:08 PM
To: Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club

Return Receipt

Your Reponse Letter to Notification Request from the Sierra Club
document:

was Kristin Henry/Sierraclub
received
by:

at: 01/02/2007 02:07:37 PM

NOTICE OF FILING APPLICATION FOR ELECTRICAL POWER PLANT SITE CERTIFICATION TO BE LOCATED IN
GLADES AND HENDRY COUNTY, FLORIDA:
FPL GLADES POWER PARK

1. Application number PA06-49 for certification to authorize construction and operation of two 980 megawatt (MW) solid fuel-fired electrical power generating units, associated electrical transmission lines, a water supply pipeline and site access roads, was filed by Florida Power & Light Company (FPL) with the Florida Department of Environmental Protection (FDEP) on December 22, 2006. The Project is known as the FPL Glades Power Park (FGPP) Project (Project). The 4,900 acre power plant site is located about 2.2 miles northwest of Moore Haven in an unincorporated area of Glades County, Florida. Associated transmission lines are proposed to be located in Glades and Hendry Counties. The plant site, the locations of the water supply pipeline and site access roads, and the corridor within which the transmission line right-of-way will be acquired are shown on the accompanying map. FPL is seeking certification of the Project under the Florida Electrical Power Plant Siting Act (PPSA or Act). The case is now pending before the Florida Division of Administrative Hearings (DOAH), Case No. 06-5344EPP prior to action by the Florida Governor and Cabinet, pursuant to the Florida Electrical Power Plant Siting Act, Chapter 403, Part II, Florida Statutes (F.S.) (2006).

2. Each of the two new generating units will consist of an ultra-supercritical pulverized-coal boiler, a steam turbine generator, and a mechanical draft-cooling tower. The air pollution control equipment will consist of selective catalytic reduction (SCR) to control nitrogen oxides, fabric filter for particulate control, wet limestone flue gas desulfurization (FGD) for control of sulfur dioxide, a wet electrostatic precipitator (WESP) to control fine particulates and sorbent injection for additional mercury control. The FGPP will utilize coal and co-fire up to 20 percent petroleum coke with coal. Facilities for handling and storage of coal, ammonia, limestone, bottom ash, fly ash and FGD byproduct (gypsum) must be constructed onsite. The raw materials will be received by train delivery using existing rail lines. The solid byproducts generated from the combustion process (fly ash, bottom ash, and FGD byproduct) will be recycled to the greatest extent possible or stored onsite. Cooling water and other process waters will be obtained from onsite stormwater, nearby canals, reclaimed wastewater, the surficial aquifer and the Upper Floridan Aquifer. The Project will include new 500 kilovolt (kV) transmission lines to connect the Project to FPL's existing electrical transmission system. The proposed transmission line corridor will be narrowed later to a final right-of-way between 350 feet and 500 feet in width prior to final construction. A new 2.4 mile-long water supply pipeline will be constructed between the FGPP site and the C-19 Canal, where a water intake structure will be installed. The proposed Project, including the electrical transmission line corridor and other associated facilities, and their potential impacts are more fully described in the Site Certification Application, which is available for review at the locations identified below.

3. The Florida Electrical Power Plant Act (Sections 403.501 - 403.518, F.S.), under which the Project application has been filed, involves several procedural steps. Various state, regional and local agencies are reviewing the application for site certification and preparing reports on the Project. The affected local governments will be issuing determinations on the consistency of the Project site and any directly associated facilities with existing land use plans and zoning ordinances that were in effect on the date the application was filed. Additional public notice of the local government land use determinations will be provided. A land use and zoning hearing will be held if those determinations are disputed. The Florida Department of Environmental Protection (FDEP) will prepare a Project

Analysis which will contain copies of studies and reports prepared by the reviewing agencies, and the recommendations of the Department as to the disposition of the application for site certification, along with any proposed conditions of certification. A certification hearing will be held at a later date at a location in proximity to the Project site unless the parties to this proceeding agree that there are no disputed issues of fact or law to be raised at the certification hearing. If held, the final site certification hearing will be conducted by an administrative law judge from the Division of Administrative Hearings at a location near the Project site. The administrative law judge will then issue a recommended order for consideration by the Siting Board which will render the final decision whether to grant certification for the Project under the PPSA. If no certification hearing is required, final action on the application for site certification may be taken by the FDEP Secretary.

4. The Application for Site Certification is available for public inspection during normal business hours at the addresses listed below:

Florida Department of Environmental Protection
Office of Siting Coordination
Mike Halpin
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 245-8002

HYPERTLINK
http://www.dep.state.fl.us/siting/htlink/application_in_progress.htm

Florida Department of Environmental Protection
South District Office
Audrey Wright
2295 Victoria Avenue, Suite 364W
Ft. Myers, FL 33901-3381
(239) 332-6975

Clewiston Public Library
111 Riverside Avenue
Clewiston, FL 33440

Glades County Public Library
111 Florida Drive
Moore Haven, FL 33471

Labelle Public Library
461 N. Main Street
Labelle, FL 33935-4610

Florida Power & Light Company
Okreebae Service Center
825 NE 34th Avenue
Okreebae, FL 34973
Contact: Donna Padgett
863-467-3708
Available during business hours
Please call for appointment

The business address of the applicant for the Project is:

Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408
561-691-7054
Contact: Kathy Salvador
Available during business hours
Please call for appointment

5. FDEP and other state, regional, and local agencies will be studying the application and preparing reports and recommendations on the Project. Interested persons should review the application and bring any matters of concern to the attention of the appropriate agency and FPL as soon as possible. Information regarding the appropriate contact persons in the reviewing agencies may be obtained from Mike Halpin at the Department of Environmental Protection, Siting Coordination Office, 2600 Blair Stone Road, Tallahassee, Florida 32399, (850) 245-8002.

6. (a) Any person wishing to participate in the proceedings, either as a party or without party status, must follow Section 403.508(3), F.S. Notwithstanding the provisions of Chapter 120, F.S., upon the filing with the administrative law judge of a notice of intent to be a party no later than 75 days after the application was filed on December 22, 2006, the following shall also be parties to the proceeding:

1. Any agency not listed in Section 403.508(3)(a), F.S., as to matters within its jurisdiction.

2. Any domestic nonprofit corporation or association formed, in whole or in part, to promote conservation or natural beauty; to protect the environment, personal health, or other biological values; to preserve historical sites; to promote consumer interests; to represent labor, commercial, or industrial groups; or to promote comprehensive planning or orderly development of the area in which the proposed electrical power plant is to be located.

(b) Other parties may include any person, including those persons enumerated in paragraph 6 who have failed to timely file a notice of intent to be a party, whose substantial interests are affected and being determined by the proceeding and who timely file a motion to intervene pursuant to Chapter 120, F.S., and applicable rules. Intervention pursuant to this paragraph may be granted at the discretion of the designated administrative law judge and upon such conditions as he may prescribe any time prior to 30 days before the commencement of the certification hearing. Those wishing to intervene in this proceeding, unless appearing on their own behalf, must be represented by an attorney or other person who can be determined to be qualified to appear in administrative proceedings pursuant to Chapter 120, F.S., or Rule 28-106.106, Florida Administrative Code.

(c) When appropriate, any person may be given an opportunity

to present oral or written communications to the designated administrative law judge. If the designated administrative law judge proposes to consider such communications, then all parties shall be given an opportunity to cross-examine or challenge or rebut such communications.

7. Any notice of intent to be a party, motion to intervene or other pleadings must be sent to:

Hon. J. Lawrence Johnston
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060

and must contain the following: reference to the application and DOAH case numbers (PA06-49; DOAH Case No. 06-5344EPP); the name, address and telephone number of the agency or person making the filing. A notice of intent to be a party or a motion to intervene must contain allegations sufficient to demonstrate the agency or person is entitled to participate in the proceeding. The notice or motion must be sent by mail to the applicant and to all parties. (A list of parties may be obtained from the Department's Office of Siting Coordination at the address and telephone number listed above.)

8. (a) Subject to the conditions set forth herein, any certification shall constitute the sole license of the state and any agency as to the approval of the site and the construction and operation of the proposed electrical power plant,

including the associated transmission lines and other facilities, except for the issuance of de minimis licenses required under any federally delegated or approved permit program and except as otherwise provided in subsection 403.511(4), Florida Statutes, which relates to certain powers of the Florida Public Service Commission and rights of local government.

(b) The certification shall authorize FPL to construct and operate the proposed electrical power plant, including the associated transmission lines and other facilities, subject only to the conditions of certification set forth in such certification, and except for the issuance of FDEP licenses or permits required under any federally delegated or approved permit program.

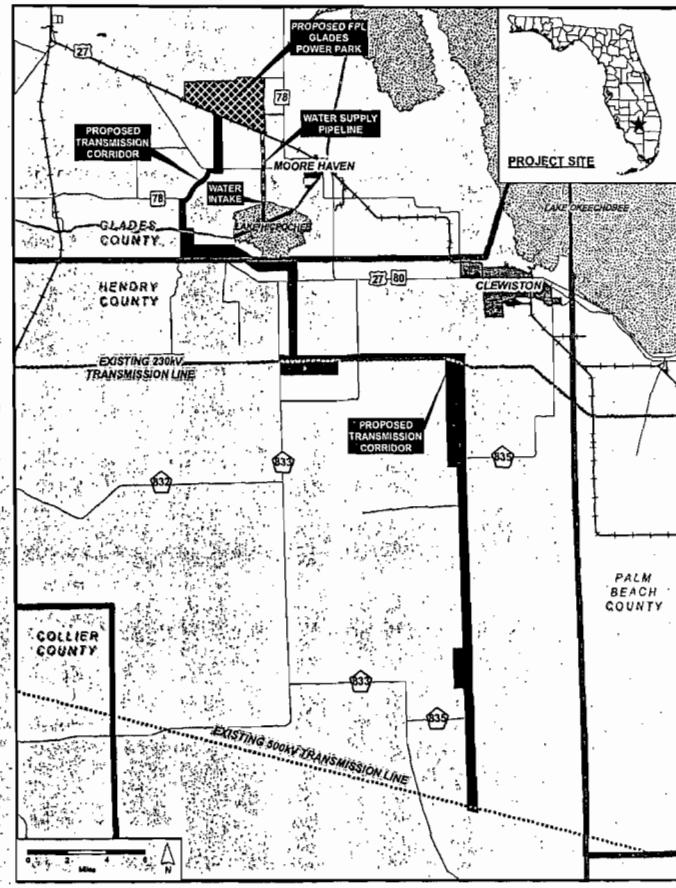
(c) In regard to variances or other relief, Section 403.507(3)(a), F.S. and Rule 62-17.13(2), F.A.C., require that agencies identify in their report on the Project any needed variances or other relief from nonprocedural standards of the agencies. Failure to provide such notice shall be treated as a waiver from nonprocedural requirements of FDEP or any other agency. However, no variance shall be granted from standards or regulations of the FDEP applicable under any federally delegated or approved permit program, except as expressly allowed in such program.

9. FPL has also submitted applications to FDEP for a prevention of significant deterioration (PDS) permit and an underground

injection control exploratory well permit for the FGPP. Those two applications are included in the application. Those permits will be issued by FDEP separately from any site certification. A separate 404 Wetlands Permit application was submitted to the U.S. Army Corps of Engineers and will be reviewed and issued separately from the certification as a Federal action.

10. The Project will require the use of connection to, or the crossing of properties and works of the following state, regional or local agencies and those issues will be addressed under certification: Florida Department of Transportation, Florida Board of Trustees of the Internal Improvement Trust Funds, South Florida Water Management District, Glades County, Hendry County, and the Hendry-Hilliard Water Control District.

11. This public notice is also provided in compliance with the Federal Coastal Zone Management Act, as specified in 15 C.F.R. Part 930, Subpart D. Public comments on the Applicant's federal consistency certification should be directed to Lynn Griffin, Coordinator, Florida Coastal Management Program, Department of Environmental Protection, 3900 Commonwealth Blvd., M.S. #7, Douglas Building, Tallahassee, Florida 32399-3000.



Adams, Patty

From: Vielhauer, Trina
Sent: Friday, February 16, 2007 10:47 AM
To: Adams, Patty
Subject: FW: Miccosukee contact

Attachments: Gene Duncan.vcf



Gene Duncan.vcf (4
KB)

For Glades. Steve Terry is the guy to copy on Glades items.

-----Original Message-----

From: Mulkey, Cindy
Sent: Friday, February 16, 2007 10:32 AM
To: Vielhauer, Trina
Subject: Miccosukee contact

Trina,

I hope I forwarded Gene's voice message properly so you could hear what he said.

The Real Estate guy is Steve Terry
305-223-8380 ext. 2243

PO Box 440021
Miami, Florida 33144-0021

He said he would be interested in being copied on any action from this office.
I also gave him Al's number in case he had any specific questions about the project
pertaining to air.

Cindy Mulkey
Engineering Specialist
Bureau of Air Regulation
South Permitting Section
(850) 921-8968
FAX (850) 921-9533
SC 291-8968

-----Original Message-----

From: Vielhauer, Trina
Sent: Wednesday, February 14, 2007 9:51 AM
To: Mulkey, Cindy
Cc: Linero, Alvaro
Subject: FW:

Cindy,

Would you mind calling Mr. Duncan (attached- he is the water contact) to find out the
right air contact for the Miccosukee Tribe? We need to get them on the Glades list.

Thanks!
Trina



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 7, 2007

Ms. Kristin Henry, Esq.
Ms. Joanne Spalding, Esq.
Sierra Club
85 Second Street, 2nd Floor
San Francisco, California 94105

Sent via email with received receipt requested: kristin.henry@sierraclub.org and joanne.spalding@sierraclub.org

RE: Notification Request

Dear Ms. Henry and Ms. Spalding:

We are in receipt of your letter dated February 1, 2007 regarding notifications of future permitting actions regarding Glades Power Park and Taylor County Energy Center. We appreciate your continued interest in power plant permitting activities in Florida. As I indicated in my letter to you dated December 22, 2006, we have added the Sierra Club to our copy list for the Glades Power Park project. However, as yet we have not received an application for the Taylor County Energy Center. Our statutes do not require nor tracking systems allow us to track notification requests for as yet unsubmitted PSD applications or Site Certification projects. Therefore, at this time we are unable to add you on to a mailing list for the Taylor County Energy Center.

The following information was also contained in my letter of December 22, 2006 but is repeated here for your convenience. The Department will be posting documents related to power plant Site Certification at the following websites:

Main Website for Siting Coordination Office:

<http://www.dep.state.fl.us/siting/default.htm>

Web Site for Power Plant Siting Overview:

http://www.dep.state.fl.us/siting/Programs/Power_Plant_Siting_Overview.htm

Web Site for Power Plant Applications in Process:

http://www.dep.state.fl.us/siting/Highlights/applications_in_process.htm

In addition, the Department's Division of Air Resource Management will be posting documents related to power plant PSD projects at the following websites:

Main Website for Division of Air Resource Management:

<http://www.dep.state.fl.us/Air/default.htm>


Web Site for New Source Review PSD Construction Permits:

<http://www.dep.state.fl.us/Air/permitting/construction.htm>

You can also email or telephone Mr. Koerner, Mr. Linero or Mr. Halpin to inquire about the status of power plant applications. Upon identification of a specific pending project the Sierra Club is interested in, please email us your request to be notified of further actions on that pending project.

If you have any questions, please contact Mr. Linero or Mr. Koerner at 850/488-0114 or Mr. Halpin of the Site Certification Coordination Office at 850/245-8002. In addition, you may contact Ms. Robinette or Mr. Goorland in our Office of General Counsel at 850/245-2242.

Sincerely,



Trina L. Vielhauer

Email copies: Mr. Michael Halpin, Department's Siting Coordination Office
Mr. Scott Goorland, Department's Office of General Counsel
Ms. Rebecca Robinette, Department's Office of General Counsel
Mr. Jeff Koerner, Department's Division of Air Resource Management
Ms. Patty Adams, Department's Division of Air Resource Management
Mr. Al Linero, Department's Division of Air Resource Management



RECEIVED

FEB 06 2007

February 1, 2007

BUREAU OF REGULATION

Via Certified Mail

Trina Vielhauer, Bureau Chief
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Placement on Departmental Mailing List for All Notices of Agency Action
Related To Application for Title V Air Permits or NSR/PSD Construction
Permits for Taylor County Energy Center or Glades Power Park

Dear Ms. Vielhauer:

Pursuant to Chapter 120.60(3), Florida Statutes, please place the following persons on the departmental mailing list for all notices of agency action related to applications for Title V Air Permits and New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permits for the Taylor County Energy Center or Glades Power Park coal fired power plants:

Kristin Henry, Esq.
85 Second Street, 2nd Floor
San Francisco, CA 94105
415-977-5716
415-977-5793 (fax)
kristin.henry@sierraclub.org

Joanne Spalding, Esq.
85 Second Street, 2nd Floor
San Francisco, CA 94105
415-977-5725
415-977-5793 (fax)
joanne.spalding@sierraclub.org

Thank you for your prompt attention to this request.

Sincerely,

Kristin Henry
Staff Attorney

Gibson, Victoria

From: Kristin.Henry@sierraclub.org
Sent: Wednesday, February 07, 2007 4:18 PM
To: Gibson, Victoria
Subject: Re: Response to Sierra Club's Second Request for Notification on Power Plants

Attachments: Second Response Letter to Sierra Club.pdf



Second Response
Letter to Sier...

This email verifies that I received the following email.

Kristin Henry
Staff Attorney
Sierra Club
85 Second Street
San Francisco, CA 94105-3441
415.977.5716 phone
415.977.5793 fax
kristin.henry@sierraclub.org

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law as attorney-client and work-product confidential or otherwise confidential communications. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, immediately notify me at the telephone number above.

"Gibson,
Victoria"
<Victoria.Gibson@
dep.state.fl.us>

02/07/2007 11:16
AM

<kristin.henry@sierraclub.org>, To
<joanne.spalding@sierraclub.org>

cc
"Halpin, Mike"
<Mike.Halpin@dep.state.fl.us>,
"Goorland, Scott"
<Scott.Goorland@dep.state.fl.us>,
"Robinette, Rebecca"
<Rebecca.Robinette@dep.state.fl.us>
, "Koerner, Jeff"
<Jeff.Koerner@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Linero, Alvaro"
<Alvaro.Linero@dep.state.fl.us>,
"Vielhauer, Trina"
<Trina.Vielhauer@dep.state.fl.us>,
"Swearengin, Lisa"
<Lisa.Swearengin@dep.state.fl.us>

Subject
Response to Sierra Club's Second
Request for Notification on Power
Plants

<<Second Response Letter to Sierra Club.pdf>>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached documents. This may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the documents.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicants, the engineering community, and the public. Please advise this office of any changes to your e-mail address.

Thank you,
DEP, Bureau of Air Regulation

Vickie

Victoria Gibson, Administrative Secretary for Trina Vielhauer, Chief Bureau of Air Regulation Department of Air Resource Management victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533 (See attached file: Second Response Letter to Sierra Club.pdf)

Gibson, Victoria

From: Joanne.Spalding@sierraclub.org
Sent: Wednesday, February 07, 2007 2:56 PM
To: Gibson, Victoria
Subject: Re: Response to Sierra Club's Second Request for Notification on Power Plants

Dear Vickie,

Thank you for your response to our request for notification.

Regards,
Joanne

Joanne Spalding
Staff Attorney
Sierra Club
85 Second Street, Second Floor
San Francisco, CA 94105
415-977-5725
415-977-5793 (Fax)
joanne.spalding@sierraclub.org



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 5, 2007

Certified Mail -- Return Receipt Requested

Ms. Monica K. Reimer, Esquire
Earthjustice
111 South Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301

Sent via email with received receipt requested: mreimer@earthjustice.org and dguest@earthjustice.org

RE: Notification Request

Dear Ms. Reimer:

We are in receipt of your letter dated January 12, 2007 regarding notifications of all future actions taken regarding Glades Power Park and Taylor County Energy Center. We appreciate Earthjustice's interest in power plant permitting activities in Florida. We have added Earthjustice to our mailing list for our recently received application for the Florida Power & Light Glades Power Park project. However, our statutes do not require nor our tracking systems allow us to track notification requests for as yet unsubmitted PSD applications or Site Certification projects. Therefore, at this time we are unable to add you on to a mailing list for the Taylor County Energy Center. Upon issuance of any Department action, the applicant will publish notice in a newspaper of general circulation. Please contact our Office of General Counsel if you have questions regarding the petition or official comment period requirements.

The Department will be posting documents related to power plant Site Certification at the following websites:

Main Website for Siting Coordination Office:

<http://www.dep.state.fl.us/siting/default.htm>

Web Site for Power Plant Siting Overview:

http://www.dep.state.fl.us/siting/Programs/Power_Plant_Siting_Overview.htm

Web Site for Power Plant Applications in Process:

http://www.dep.state.fl.us/siting/Highlights/applications_in_process.htm

In addition, the Department's Division of Air Resource Management will be posting documents related to power plant PSD projects at the following websites:

Main Website for Division of Air Resource Management:

<http://www.dep.state.fl.us/Air/default.htm>


Web Site for New Source Review PSD Construction Permits:

<http://www.dep.state.fl.us/Air/permitting/construction.htm>

You can also email or telephone Mr. Koerner, Mr. Linero or Mr. Halpin to inquire about the status of power plant applications. Upon identification of a specific pending project the Earthjustice is interested in, please email us your request to be notified of further actions on that pending project.

If you have any questions, please contact Mr. Linero or Mr. Koerner at 850/488-0114 or Mr. Halpin of the Site Certification Coordination Office at 850/245-8002. In addition, you may contact Ms. Robinette or Mr. Goorland in our Office of General Counsel at 850/245-2242.

Sincerely,



Trina L. Vielhauer

Email copies: Mr. Michael Halpin, Department's Siting Coordination Office
Mr. Scott Goorland, Department's Office of General Counsel
Ms. Rebecca Robinette, Department's Office of General Counsel
Mr. Jeff Koerner, Department's Division of Air Resource Management
Ms. Patty Adams, Department's Division of Air Resource Management
Mr. Al Linero, Department's Division of Air Resource Management

Gibson, Victoria

From: Monica Reimer [mreimer@earthjustice.org]
Sent: Tuesday, February 06, 2007 9:56 AM
To: Gibson, Victoria
Subject: RE: Reponse to Earthjustice on Notification Request

My acknowledgement of receipt of notification. Monica

From: Gibson, Victoria [mailto:Victoria.Gibson@dep.state.fl.us]
Sent: Monday, February 05, 2007 4:39 PM
To: Monica Reimer; David Guest; Halpin, Mike; Goorland, Scott; Robinette, Rebecca; Koerner, Jeff; Adams, Patty; Linero, Alvaro
Cc: Vielhauer, Trina
Subject: Reponse to Earthjustice on Notification Request

<<Response letter for Notifications - Earthjustice.pdf>>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached documents. This may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the documents.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicants, the engineering community, and the public. Please advise this office of any changes to your e-mail address.

Thank you,
DEP, Bureau of Air Regulation

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
Bureau of Air Regulation
Department of Air Resource Management
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533



EARTHJUSTICE

BOZEMAN, MONTANA DENVER, COLORADO HONOLULU, HAWAII
INTERNATIONAL JUNEAU, ALASKA OAKLAND, CALIFORNIA
SEATTLE, WASHINGTON TALLAHASSEE, FLORIDA WASHINGTON, D.C.
ENVIRONMENTAL LAW CLINIC AT STANFORD UNIVERSITY

RECEIVED

JAN 29 2007

January 12, 2007

BUREAU OF AIR REGULATION

Trina Vielhauer, Bureau Chief
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

VIA CERTIFIED MAIL

Re: Placement On Departmental Mailing List For All Notices Of Agency Action
Related To Application For Title V Air Permits Or NSR/PSD Construction
Permits For Taylor County Energy Center or Glades Power Park

Dear Ms. Vielhauer:

Pursuant to Chapter 120.60(3), Florida Statutes, please place the following persons on the departmental mailing list for all notices of agency action related to applications for Title V Air Permits and New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permits for the Taylor County Energy Center or Glades Power Park coal fired power plants:

David G. Guest, Esq.
Earthjustice
111 South Martin Luther King, Jr. Boulevard
Tallahassee, Florida 32301
dguest@earthjustice.org

Monica K. Reimer, Esq.
Earthjustice
111 South Martin Luther King, Jr. Boulevard
Tallahassee, Florida 32301
mreimer@earthjustice.org

Thank you for your prompt attention to this request.

Sincerely,

Monica K. Reimer
Staff Attorney

MKR:hs

Adams, Patty

From: Linero, Alvaro
Sent: Friday, January 19, 2007 1:55 PM
To: Adams, Patty
Cc: Vielhauer, Trina
Subject: Glades Power Park

Patty:

Add the following name/group to cc list for Glades including RAI letters and notifications. FPL Glades only.

Thanks.

Al.

From: Alliance4CleanFl@aol.com [mailto:Alliance4CleanFl@aol.com]
Sent: Friday, January 19, 2007 1:20 PM
To: Linero, Alvaro
Subject: Re: Glades Power Park

Mr. Linero,

I prefer my name be on the distribution list for notification of such letters so that I will be sure to get copied.

Thank You very much,
Bob Krasowski
Project Coordinator
Florida Alliance for a Clean Environment
Alliance4CleanEnvironment@aol.com
239-434-0786

Gibson, Victoria

From: Joanne.Spalding@sierraclub.org
Sent: Thursday, December 28, 2006 2:43 PM
To: Gibson, Victoria
Subject: Re: Reponse Letter to Notification Request from the Sierra Club
Attachments: Response Letter for Notifications - Sierra Club.pdf

Thank you for your letter. Happy New Year.

Joanne Spalding
Staff Attorney
Sierra Club
85 Second Street, Second Floor
San Francisco, CA 94105
415-977-5725
415-977-5793 (Fax)
joanne.spalding@sierraclub.org

-----"Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us> wrote: -----

To: <kristin.henry@sierraclub.org>, <joanne.spalding@sierraclub.org>, "Halpin, Mike" <Mike.Halpin@dep.state.fl.us>, "Goorland, Scott" <Scott.Goorland@dep.state.fl.us>, "Robinette. Rebecca" <Rebecca.Robinette@dep.state.fl.us>
From: "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>
Date: 12/22/2006 10:53AM
cc: "Vielhauer, Trina" <Trina.Vielhauer@dep.state.fl.us>, "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>
Subject: Reponse Letter to Notification Request from the Sierra Club

<<Response Letter for Notifications - Sierra Club.pdf>>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document. This may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the documents.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicants, the engineering community, and the public. Please advise this office of any changes to your e-mail address.

Thank you,
DEP, Bureau of Air Regulation

Gibson, Victoria

From: Vielhauer, Trina
To: Gibson, Victoria
Sent: Tuesday, December 26, 2006 8:35 AM
Subject: Read: Reponse Letter to Notification Request from the Sierra Club

Your message

To: 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; Halpin, Mike; Goorland, Scott; Robinette, Rebecca
Cc: Vielhauer, Trina; Koerner, Jeff; Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club
Sent: 12/22/2006 1:54 PM

was read on 12/26/2006 8:35 AM.

Gibson, Victoria

From: Robinette, Rebecca
Sent: Tuesday, December 26, 2006 12:01 PM
To: Gibson, Victoria
Subject: RE: Reponses Letter to Notification Request from the Sierra Club

got it

Rebecca Robinette
Sr. Ass't. General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Blvd., MS 35
Tallahassee, Florida 32399-3000
(850) 245-2278
Fax: 245-2302
Rebecca.Robinette@dep.state.fl.us

Please Note: Florida has a very broad public records law. Electronic communications regarding state business are public records available to the public upon request. Your e-mail communications may therefore be subject to public disclosure.

-----Original Message-----

From: Gibson, Victoria
Sent: Friday, December 22, 2006 1:54 PM
To: 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; Halpin, Mike; Goorland, Scott; Robinette, Rebecca
Cc: Vielhauer, Trina; Koerner, Jeff; Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club
Importance: High

<< File: Response Letter for Notifications - Sierra Club.pdf >>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document. This may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the documents.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicants, the engineering community, and the public. Please advise this office of any changes to your e-mail address.

Thank you,

DEP, Bureau of Air Regulation

Gibson, Victoria

From: Joanne.Spalding@sierraclub.org
Sent: Friday, December 22, 2006 6:10 PM
To: Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club

Return Receipt

Your Reponse Letter to Notification Request from the Sierra Club
document:

was Joanne Spalding/Sierraclub
received
by:

at: 12/22/2006 03:09:55 PM

Gibson, Victoria

From: Robinette. Rebecca
To: Gibson, Victoria
Sent: Tuesday, December 26, 2006 12:00 PM
Subject: Read: Reponse Letter to Notification Request from the Sierra Club

Your message

To: 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; Halpin, Mike; Goorland, Scott; Robinette. Rebecca
Cc: Vielhauer, Trina; Koerner, Jeff; Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club
Sent: 12/22/2006 1:54 PM

was read on 12/26/2006 12:00 PM.

Gibson, Victoria

From: Goorland, Scott
To: Gibson, Victoria
Sent: Friday, December 22, 2006 2:00 PM
Subject: Read: Reponse Letter to Notification Request from the Sierra Club

Your message

To: 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; Halpin, Mike; Goorland, Scott; Robinette, Rebecca
Cc: Vielhauer, Trina; Koerner, Jeff; Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club
Sent: 12/22/2006 1:54 PM

was read on 12/22/2006 2:00 PM.

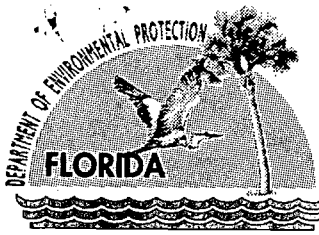
Gibson, Victoria

From: Halpin, Mike
To: Gibson, Victoria
Sent: Friday, December 22, 2006 3:45 PM
Subject: Read: Reponse Letter to Notification Request from the Sierra Club

Your message

To: 'kristin.henry@sierraclub.org'; 'joanne.spalding@sierraclub.org'; Halpin, Mike; Goorland, Scott; Robinette, Rebecca
Cc: Vielhauer, Trina; Koerner, Jeff; Gibson, Victoria
Subject: Reponse Letter to Notification Request from the Sierra Club
Sent: 12/22/2006 1:54 PM

was read on 12/22/2006 3:45 PM.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

December 22, 2006

Electronically Sent – Received Receipt Requested

Ms. Kristin Henry
Sierra Club
85 Second Street, 2nd Floor
San Francisco, California 94105
kristin.henry@sierraclub.org

RE: Notification Request

Dear Ms. Henry:

We are in receipt of your letter dated December 19, 2006 regarding notifications of all future actions taken regarding power plants in Florida. We appreciate Sierra Club's interest in power plant permitting activities in Florida. We will add the Sierra Club (c/o Ms. Henry and Ms. Spalding) to our mailing list for our recently received application for the Florida Power & Light Glades Power Park and the pending Seminole Electric Cooperative Palatka Generating Station project. However, our statutes do not require nor our tracking systems allow us to track notification requests for as yet unsubmitted PSD applications or Site Certification projects. Upon issuance of any Department action, the applicant will publish notice in a newspaper of general circulation. Please contact our Office of General Counsel if you have questions regarding the petition or official comment period requirements.

The Department will be posting documents related to power plant Site Certification at the following websites:

Main Website for Siting Coordination Office:

<http://www.dep.state.fl.us/siting/default.htm>

Web Site for Power Plant Siting Overview:

http://www.dep.state.fl.us/siting/Programs/Power_Plant_Siting_Overview.htm

Web Site for Power Plant Applications in Process:

http://www.dep.state.fl.us/siting/Highlights/applications_in_process.htm

In addition, the Department's Division of Air Resource Management will be posting documents related to power plant PSD projects at the following websites:

Main Website for Division of Air Resource Management:

<http://www.dep.state.fl.us/Air/default.htm>

Web Site for New Source Review PSD Construction Permits:

<http://www.dep.state.fl.us/Air/permitting/construction.htm>

"More Protection, Less Process"


Printed on recycled paper.

Ms. Kristin Henry
December 22, 2006
Page 2

You may also email or telephone Mr. Koerner, Mr. Halpin or myself to inquire about the status of power plant applications. Upon identification of a specific pending project the Sierra Club is interested in, please email us your request to be notified of further actions on that pending project.

If you have any questions, please contact Mr. Koerner or me at 850/488-0114 and Mr. Halpin at 850/245-8002. In addition, you may contact Ms. Robinette or Mr. Goorland in our Office of General Counsel at 850/245-2242.

Sincerely,



For

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jk

cc: Ms. Joanne Spalding, Sierra Club* joanne.spalding@sierraclub.org
Mr. Michael Halpin, DEP Siting Coordination Office* mike.halpin@dep.state.fl.us
Mr. Scott Goorland, DEP Office of General Counsel* scott.goorland@dep.state.fl.us
Ms. Rebecca Robinette, DEP Office of General Counsel* rebecca.robinette@dep.state.fl.us

(*) All of the above cc's were sent an electronic copy with received receipt requested.



December 19, 2006

Via Electronic Mail: mike.halpin@dep.state.fl.us
jeff.koerner@dep.state.fl.us
trina.vielhauer@dep.state.fl.us

Trina Vielhauer
Mike Halpin
Jeff Koerner
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

RE: Notification of all future actions taken regarding power plants in Florida

Dear Ms. Vielhauer, Mr. Halpin and Mr. Koerner,

I am writing on behalf of the Sierra Club to request that the Club be notified of all future proposed or final actions by the Florida Department of Environmental Protection related to any power plant in Florida. The phrase "all future proposed or final actions" includes, but is not limited to, all future notifications regarding initiation of certification processes, proposed draft air permits, such as "Written Notices of Intent to Issue Air Permit," final air permits, comments submitted to the agency regarding proposed power plants, and Florida Department of Environmental Protection's response to such comments. The phrase "any power plant in Florida" includes any proposed new coal-fired power plants and expansion of existing coal-fired power plants. In addition to this general notification request, the Club specifically requests notification of all future Florida Department of Environmental Protection proposed or final actions for the following power plants:

- Florida Power & Light Glades Power Park
- Lakeland Electric's Expansion of its McIntosh Facility
- Orlando Utilities Commission and Southern Power Company proposed power plant in Orange County, Florida
- Gainesville Regional Utilities proposed power plant in Gainesville, Florida

- Seminole Electric Cooperative Palatka Generating Station
- Taylor Energy Center

All future notifications should be sent to the following individuals at the Sierra Club:

Kristin Henry
Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105
kristin.henry@sierraclub.org
415-977-5716

Joanne Spalding
Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105
joanne.spalding@sierraclub.org
415-977-5725

Please note that this request does not supersede any prior or future requests for notification submitted by individual Sierra Club members or representatives. If you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

Kristin Henry

**NOTICE OF FILING APPLICATION FOR ELECTRICAL POWER PLANT SITE CERTIFICATION TO BE LOCATED IN
GLADES AND HENDRY COUNTY, FLORIDA:
FPL GLADES POWER PARK**

1. Application number PA06-49 for certification to authorize construction and operation of two 980 megawatt (MW) solid fuel-fired electrical power generating units, associated electrical transmission lines, a water supply pipeline and site access roads, was filed by Florida Power & Light Company (FPL) with the Florida Department of Environmental Protection (FDEP) on December 22, 2006. The Project is known as the FPL Glades Power Park (FGPP) Project (Project). The 4,900 acre power plant site is located about 2.3 miles northwest of Moore Haven in an unincorporated area of Glades County, Florida. Associated transmission lines are proposed to be located in Glades and Hendry Counties. The plant site, the locations of the water supply pipeline and site access roads, and the corridor within which the transmission line right-of-way will be acquired are shown on the accompanying map. FPL is seeking certification of the Project under the Florida Electrical Power Plant Siting Act (PPSA or Act). The case is now pending before the Florida Division of Administrative Hearings (DOAH), Case No. 06-5344EPP prior to action by the Florida Governor and Cabinet, pursuant to the Florida Electrical Power Plant Siting Act, Chapter 403, Part II, Florida Statutes (F.S.) (2006).

2. Each of the two new generating units will consist of an ultra-supercritical pulverized coal-fired boiler, a steam turbine generator, and a mechanical draft-cooling tower. The air pollution control equipment will consist of selective catalytic reduction (SCR) to control nitrogen oxides, fabric filter for particulate control, wet limestone flue gas desulfurization (FGD) for control of sulfur dioxide, a wet electrostatic precipitator (WESP) to control fine particulates and sorbent injection for additional mercury control. The FGPP will utilize coal and co-fire up to 20 percent petroleum coke with coal. Facilities for handling and storage of coal, ammonia, limestone, bottom ash, fly ash and FGD byproduct (gypsum) will be constructed onsite. The raw materials will be received by train delivery using existing rail lines. The solid byproducts generated from the combustion process (fly ash, bottom ash, and FGD byproduct) will be recycled to the greatest extent possible or stored onsite. Cooling water and other process waters will be obtained from onsite stormwater, nearby canals, reclaimed wastewater, the surficial aquifer and the Upper Floridan Aquifer. The Project will include new 500 kilovolt (kV) transmission lines to connect the Project to FPL's existing electrical transmission system. The proposed transmission line corridor will be narrowed later to a final right-of-way between 350 feet and 500 feet in width prior to final construction. A new 3.4 mile-long water supply pipeline will be constructed between the FGPP site and the C-19 Canal, where a water intake structure will be installed. The proposed Project, including the electrical transmission line corridor and other associated facilities, and their potential impacts are more fully described in the Site Certification Application, which is available for review at the locations identified below.

3. The Florida Electrical Power Plant Act (Sections 403.501 - 403.518, F.S.), under which the Project application has been filed, involves several procedural steps. Various state, regional and local agencies are reviewing the application for site certification and preparing reports on the Project. The affected local governments will be issuing determinations on the consistency of the Project site and any directly associated facilities with existing land use plans and zoning ordinances that were in effect on the date the application was filed. Additional public notice of the local government land use determinations will be provided. A land use and zoning hearing will be held if those determinations are disputed. The Florida Department of Environmental Protection (FDEP) will prepare a Project

Analysis which will contain copies of studies and reports prepared by the reviewing agencies, and the recommendation of the Department as to the disposition of the application for site certification, along with any proposed conditions of certification: A certification hearing will be held at a later date at a location in proximity to the Project site unless the parties to this proceeding agree that there are no disputed issues of fact or law to be raised at the certification hearing. If held, the final site certification hearing will be conducted by an administrative law judge from the Division of Administrative Hearings at a location near the Project site. The administrative law judge will then issue a recommended order for consideration by the Siting Board which will render the final decision whether to grant certification for the Project under the PPSA. If no certification hearing is required, final action on the application for site certification will be taken by the FDEP Secretary.

4. The Application for Site Certification is available for public inspection during normal business hours at the addresses listed below:

**Florida Department of Environmental Protection
Office of Siting Coordination
Mike Halpin
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 245-8002**

H Y P E R L I N K
"http://www.dep.state.fl.us/siting/highlights/application_in_process.htm" http://www.dep.state.fl.us/siting/highlights/application_in_process.htm

**Florida Department of Environmental Protection
South District Office
Audrey Wright
2295 Victoria Avenue, Suite 364W
Ft. Myers, FL 33901-3381
(239) 332-6975**

**Clewiston Public Library
120 W. Osceola Avenue
Clewiston, FL 33440**

**Glades County Public Library
11 Riverside Drive
Moore Haven, FL 33471**

**Labelle Public Library
461 N. Main Street
Labelle, FL 33935-4610**

**Florida Power & Light Company
Okeechobee Service Center
825 NE 34th Avenue
Okeechobee, FL 34973
Contact: Donna Padgett
863-467-3708
Available during business hours
- Please call for appointment**

The business address of the applicant for the Project is:

**Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408
561-691-7054
Contact: Kathy Salvador
Available during business hours
- Please call for appointment**

5. FDEP and other state, regional, and local agencies will be studying the application and preparing reports and recommendations on the Project. Interested persons should review the application and bring any matters of concern to the attention of the appropriate agency and FPL as soon as possible. Information regarding the appropriate contact persons in the reviewing agencies may be obtained from Mike Halpin at the Department of Environmental Protection, Siting Coordination Office, 2600 Blair Stone Road, Tallahassee, Florida 32399, (850-245-8002)

6. (a) Any person wishing to participate in the proceedings, either as a party or without party status must follow Section 403.508(3), F.S. Notwithstanding the provisions of Chapter 120, F.S., upon the filing with the administrative law judge of a notice of intent to be a party no later than 75 days after the application was filed on December 22, 2006, the following shall also be parties to the proceeding:

1. Any agency not listed in Section 403.508(3)(a), F.S., as to matters within its jurisdiction.

2. Any domestic nonprofit corporation or association formed, in whole or in part, to promote conservation or natural beauty; to protect the environment, personal health, or other biological values; to preserve historical sites; to promote consumer interests; to represent labor, commercial, or industrial groups; or to promote comprehensive planning or orderly development of the area in which the proposed electrical power plant is to be located.

(b) Other parties may include any person, including those persons enumerated in paragraph 6 who have failed to timely file a notice of intent to be a party, whose substantial interests are affected and being determined by the proceeding and who timely file a motion to intervene pursuant to Chapter 120, F.S., and applicable rules. Intervention pursuant to this paragraph may be granted at the discretion of the designated administrative law judge and upon such conditions as he may prescribe any time prior to 30 days before the commencement of the certification hearing. Those wishing to intervene in this proceeding, unless appearing on their own behalf, must be represented by an attorney or other person who can be determined to be qualified to appear in administrative proceedings pursuant to Chapter 120, F.S., or Rule 28-106.106, Florida Administrative Code.

(c) When appropriate, any person may be given an opportunity

to present oral or written communications to the designated administrative law judge. If the designated administrative law judge proposes to consider such communications, then all parties shall be given an opportunity to cross-examine or challenge or rebut such communications.

7. Any notice of intent to be a party, motion to intervene or other pleadings must be sent to:

**Hon. J. Lawrence Johnston
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060**

and must contain the following: reference to the application and DOAH case numbers (PA06-49; DOAH Case No. 06-5344EPP); the name, address and telephone number of the agency or person making the filing. A notice of intent to be a party or a motion to intervene must contain allegations sufficient to demonstrate the agency or person is entitled to participate in the proceeding. The notice or motion must be sent by mail to the applicant and to all parties. (A list of parties may be obtained from the Department's Office of Siting Coordination at the address and telephone number listed above.)

8. (a) Subject to the conditions set forth therein, any certification shall constitute the sole license of the state and any agency as to the approval of the site and the construction and operation of the proposed electrical power plant,

including the associated transmission lines and other facilities, except for the issuance of department licenses required under any federally delegated or approved permit program and except as otherwise provided in subsection 403.511(4), Florida Statutes, which relates to certain powers of the Florida Public Service Commission and rights of local government.

(b) The certification shall authorize FPL to construct and operate the proposed electrical power plant, including the associated transmission lines and other facilities, subject only to the conditions of certification set forth in such certification, and except for the issuance of FDEP licenses or permits required under any federally delegated or approved permit program.

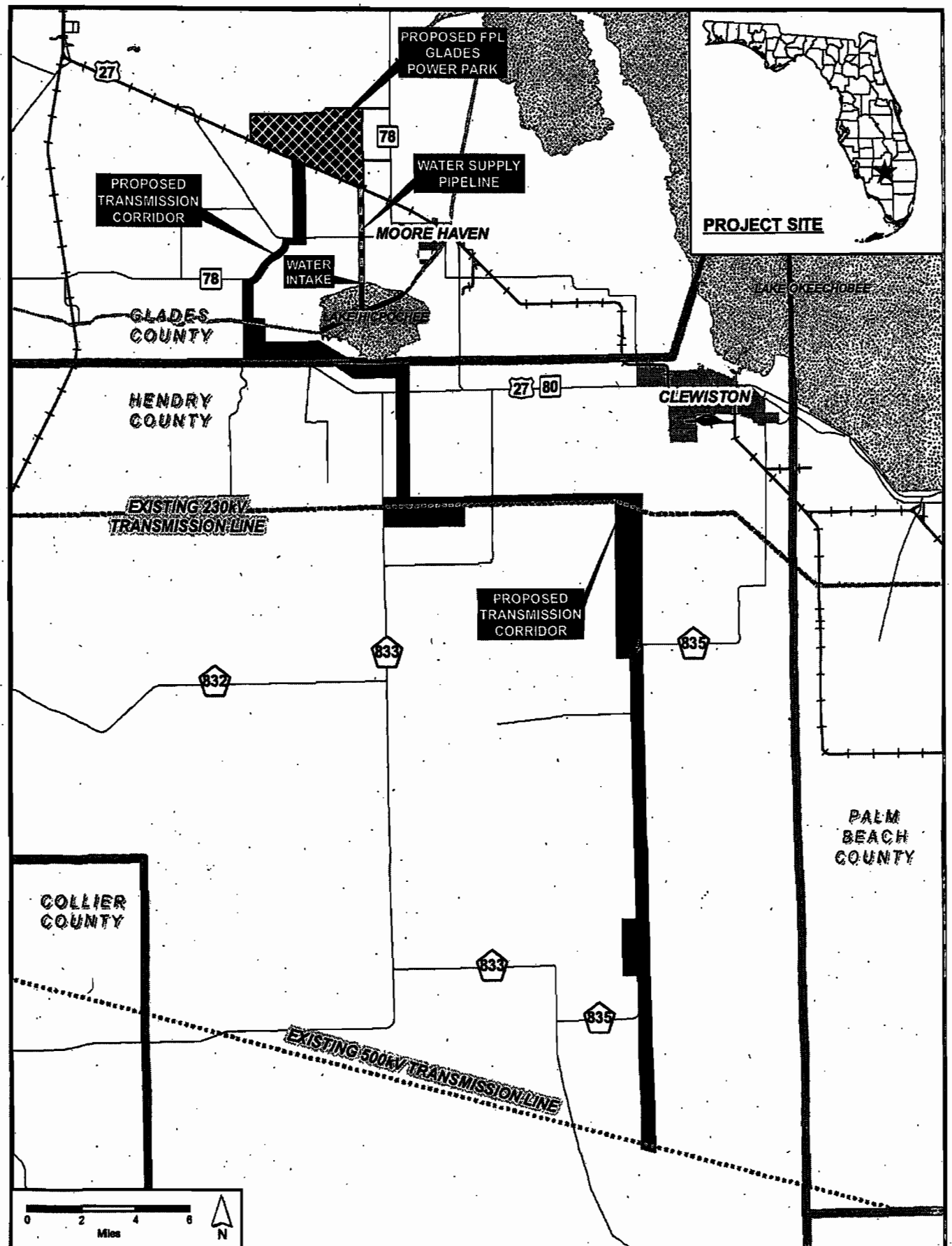
(c) In regard to variances or other relief, Section 403.507(3)(a), F.S. and Rule 62-17.133(2), F.A.C., require that agencies identify in their report on the Project any needed variances or other relief from nonprocedural standards of the agencies. Failure to provide such notice shall be treated as a waiver from nonprocedural requirements of FDEP or any other agency. However, no variance shall be granted from standards or regulations of the FDEP applicable under any federally delegated or approved permit program, except as expressly allowed in such program.

9. FPL has also submitted applications to FDEP for a prevention of significant deterioration (PSD) permit and an underground

injection control exploratory well permit for the FGPP. Those two applications are included in the application. Those permits will be issued by DEP separately from any site certification. A separate 404 Wetlands Permit application was submitted to the U.S. Army Corps of Engineers and will be reviewed and issued separately from the certification as a Federal action.

10. The Project will require the use of, connection to, or the crossing of properties and works of the following state, regional or local agencies and those issues will be addressed under certification: Florida Department of Transportation, Florida Board of Trustees of the Internal Improvement Trust Fund, South Florida Water Management District, Glades County, Hendry County, and the Hendry-Hilliard Water Control District.

11. This public notice is also provided in compliance with the Federal Coastal Zone Management Act, as specified in 15 CFR Part 930, Subpart D. Public comments on the Applicant's federal consistency certification should be directed to Lynn Griffin, Coordinator, Florida Coastal Management Program, Department of Environmental Protection, 3900 Commonwealth Blvd., M.S. 47, Douglas Building, Tallahassee, Florida 32399-3000.



Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



April 9, 2007

0637567-1105

Bureau of Air Regulation, South Permitting Section
Florida Department of Environmental Protection
111 South Magnolia Street
Tallahassee, Florida 32399

RECEIVED

APR 10 2007

Attn: Mr. A. A. Linero, Program Administrator

RE: FPL Glades Power Park
DEP File No. 0430017-001-AC, PSD-FL-385
April 4, 2007 NPS Comments

BUREAU OF AIR REGULATION

Dear Mr. Linero:

On behalf of Florida Power & Light Co. (FPL) and as the engineer-of-record for the Air Construction/Prevention of Significant Deterioration (PSD) Permit Application, this correspondence provides information to further address the points listed in the April 4, 2007 cover letter from the National Park Service (NPS). In the full context of the NPS comments, the information requested is not necessarily related to completeness of the Air Construction/PSD Permit Application. Rather, the NPS letter and attachment are actually comments that would be related to the permit conditions that the Florida Department of Environmental Protection (FDEP) would ultimately issue as a draft Air Construction/PSD Permit. Nonetheless, additional information is being provided for the items listed in the cover letter that further supports information submitted previously.

NPS 1) PM₁₀ emission issues:

- **Emission limit for use in air quality modeling analyses, including both filterable and condensable portion of PM₁₀ emissions.**
- **Explanation of why the facility cannot meet a filterable PM₁₀ limit of 0.010 lb/MMBtu on a 24-hour basis.**

The filterable and condensable PM from FGPP was properly accounted for in the air modeling analyses submitted to FDEP. The filterable PM emission limit proposed by FPL for FGPP is 0.013 lb/MMBtu. The PM and PM₁₀ emission limit for filterable material from FGPP is proposed on a 3-hour stack test basis. For sulfuric acid mist (SAM), which is the primary condensable that is emitted from the FPL Glades Power Park (FGPP), an emission limit of 0.004 lb/MMBtu is proposed. The air modeling analyses performed for FGPP included filterable PM and SAM as a condensable PM. In addition, an emission rate of 0.001 lb/MMBtu was used to account for potential organic condensable PM. Therefore, the total PM, which would include filterable and condensable PM, used in the air quality modeling analyses was equivalent to an emission rate of 0.018 lb/MMBtu.

The April 4, 2007 letter from the NPS suggests that the speciation should be developed using information posted on the NPS website: <http://www2.nature.nps.gov/air/permits/ect/ectCoalFiredBoiler.cfm>.

The information referenced and contained in the website was developed using U.S. Environmental Protection Agency (EPA) AP-42 emission factors, which are used when no specific information is

available. In addition, information in the NPS AP-42 emission factors spreadsheet does not include the suite of air quality control systems proposed for FGPP. The technical comparison of air quality control systems closest to that proposed for FGPP that could be used for developing particulate speciation is the NPS AP-42 emission factors spreadsheet for a pulverized coal fired unit with a fabric filter and wet flue gas desulfurization (FGD). In contrast, FGPP will also include both sorbent injection and a wet electrostatic precipitator (WESP) specifically designed to reduce both filterable and condensable PM. The difference in controls from that listed in the NPS AP-42 emission factors spreadsheet and those proposed for FGPP was acknowledged by both the NPS and FDEP during recent discussions on April 2, 2007. Indeed, sorbent injection and WESP are designed to achieve an emission rate of SAM of 0.004 lb/MMBtu, which is an order of magnitude lower than that calculated in the AP-42 emission factors spreadsheet for using only a fabric filter and wet FGD. The overall removal of condensable PM using sorbent injection and WESP will be 90 percent or greater. Using the NPS AP-42 emission factors spreadsheet and inputting FGPP information, the condensable PM emission rate after considering the additional controls of sorbent injection and WESP compares favorably with the 0.004 lb/MMBtu emission rate proposed for SAM and the 0.001 lb/MMBtu emission rate used for organic condensable PM. The use of a 0.001 lb/MMBtu emission rate for organic condensable PM is also supported by the NPS AP-42 emission factors spreadsheet based on the expected ratio between inorganic and organic condensable PM. The NPS AP-42 emission factors spreadsheet indicates that 80 percent of the condensable PM will be inorganic and 20 percent organic. The use of 0.004 lb/MMBtu for the primary condensable PM and 0.001 lb/MMBtu for organic condensable PM is in the same ratio (i.e., 80/20).

The PM and PM₁₀ emission limit for filterable material proposed for FGPP is 0.013 lb/MMBtu and is consistent with recent FDEP determinations. This is the same emission limit proposed as best available control technology (BACT) by FDEP in 2006 for the recent Seminole Generating Station Unit 3 Project (PSD-FL-375; FDEP File 1070025-005-AC).

A limit of 0.013 lb/MMBtu on a 3-hour stack test was used as the emission rate in the air modeling for the 24-hour averaging time. This assumption results in conservative modeling predictions. In addition, a slightly higher value for a 3-hour stack test is considered equivalent to a slightly lower emission limit on a 24-hour basis. Therefore, a 24-hour emission limit is not necessary.

NPS 2) Cumulative Class I increment analysis issues:

- **Rationale for sources included in the analysis.**
- **Rationale for the method used to determine changes in emissions from existing sources.**
- **Rationale for determination of baseline emissions.**

The emissions inventory for FGPP was developed based on the June 20, 2006, air modeling protocol submitted to FDEP to address PSD Class I modeling and the comments received from the NPS in July 2006. It should be noted that the April 4, 2007, letter from the NPS addresses many more items than previously commented on by the NPS in July 2006 regarding the protocol and in their January 18, 2007 comment letter on the PSD application.

The emissions inventory used in the modeling was based on an inventory of sulfur dioxide (SO₂), nitrogen oxides (NO_x), and PM-emitting facilities obtained from the FDEP in September 2006. First, a list of all SO₂ emitting facilities was compiled. Facilities were included or excluded from the inventory based on the following criteria:

- (1) An approximate central location of the Everglades National Park (NP) was chosen, which is almost 50 kilometers (km) from the northeast and the east edges of the park and 75 km from the northwest edge. The distances of all the sources were measured from this approximate center location, and all PSD increment-consuming sources located 275 km or less from the center were included. Since the farthest edge of the park is 75 km from the center, a source located more than 275 km from the center is more than 200 km from the edge of the park.
- (2) PSD increment sources that were found to be located between 200 and 275 km from the approximate center were checked for their exact distance from the nearest park boundary and were included if they were found to be located 200 km or less from the boundary. The exact distances from the nearest boundary were measured graphically after plotting all the sources and the Everglades NP.
- (3) Next, the PSD increment-consuming sources located beyond 50 km from the Everglades NP boundary, but with potential emissions of less than 10 tons per year (TPY), were excluded.
- (4) Finally, PSD increment-consuming sources located within 50 km of the Everglades NP boundary but with potential emissions of less than 1 TPY were excluded.

The remaining list had 70 sources with more than 200 stacks. From this list, sources that were included in other inventories developed over the last 15 years for other PSD permit applications that addressed PSD Class I increment consumption were included in the modeling analysis.

Once a list of sources to be included in modeling was finalized, detailed stack parameters were compiled from other project inventories, the FDEP inventory, and in some cases, from recent permit applications. Potential emission rates, obtained from the current Title V permits, were used for all PSD increment-consuming sources. For SO₂ emission rates, only hourly (24-hour average) emission rates were used. If the emissions unit had no permit emission limit, emission rates were calculated using AP-42 emission factors. If available, emission rates were taken from the recent PSD permit applications.

Some examples are provided below.

Examples of Emission Rates Used in Modeling

Source: FPL Turkey Point Unit 5

This is a PSD increment-consuming source and the potential emissions were used in the modeling analysis. Emission rate was taken from PSD permit application for FPL Turkey Point expansion project dated November 2003.

Emission scenario: Baseload, natural gas-fired, 35 F, duct-firing case.

Emission rate of 1 combustion turbine (CT): 13.2 pounds per hour (lb/hr) or 1.67 gallons per second (g/s).

Emission rate of 4 CTs: $1.67 \text{ g/s} \times 4 = 6.68 \text{ g/s}$

Source: Lake Worth Utilities

This source has both baseline and PSD increment-consuming emissions units. Unit Nos. 3 and 4 are baseline units with commercial operation dates of 1966 and 1970, respectively. Unit No. 5 and CT No. 1 are increment-consuming units with commercial operation dates in 1978 and 1976, respectively. An example for CT No. 1 follows.

Emission rates for CT No. 1: Emission rate calculated using AP-42 Tab 1.3-1 and 0.35 %S No. 2 fuel oil. Heating value of No. 2 fuel oil assumed as 140 MMBtu/thousand gallons. CT No. 1 is limited to a heat input rate of 435 MMBtu/hr. Emission rate = $435 \text{ MMBtu/hr} \times 157 \times 0.35 \times 1/140 = 170.7 \text{ lb/hr}$.

The emission inventory used for FGPP was based on previous inventories that were used for numerous projects where the SO₂ impacts in the Everglades NP exceeded the Class I significant impact levels and a cumulative impact analysis was required. These projects were reviewed by the FDEP and NPS in determining if the specific project would comply with the PSD Class I Increments. This review included the recent Turkey Point Unit 5 Project, which was located within 21 km of the Everglades NP and received approval from FDEP. In fact, the maximum impacts from FGPP are not substantially different than those of Turkey Point Unit 5 as shown below. The maximum SO₂ impacts for Turkey Point Unit 5 were based on gas firing.

- **Maximum SO₂ Impacts of Turkey Point Unit 5:** 0.037 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) (annual) 0.38 $\mu\text{g}/\text{m}^3$ (maximum 24-hour) and 1.76 $\mu\text{g}/\text{m}^3$ (maximum 3-hour)
- **Maximum SO₂ Impacts of FGPP:** 0.015 $\mu\text{g}/\text{m}^3$ (annual) 0.42 $\mu\text{g}/\text{m}^3$ (maximum 24-hour) and 2.61 $\mu\text{g}/\text{m}^3$ (maximum 3-hour)

Changes in actual emissions from the baseline date to present for existing sources was previously evaluated in other modeling studies conducted by Golder Associates Inc. staff from the early 1980s to present. The major existing SO₂ sources in the southern Florida region are the FPL power plants. These existing plants include Turkey Point (Units 1 and 2), Port Everglades (Units 1-4), Riviera (Units 3 and 4), Martin (Units 1 and 2), and Cutler (Units 5 and 6). These plants have primarily used the same sulfur content residual fuels since the baseline date due to New Source Performance Standards (NSPS) requirements in the case of the Martin Plant or requirements or agreements with the local governments (e.g., Broward and Miami-Dade Counties) as is the case with the Turkey Point and Port Everglades plants. In the mid-1970s, the Turkey Point, Port Everglades, and Riviera plants were primarily operated as baseload plants. Currently, all of these plants are operated as cycling

plants with much lower residual oil usage and capacity factors. This is demonstrated in Table Baseline-Present that shows the fuel usage and capacity factors for these plants in 1975 and 2006. As shown in this table, the residual fuel usage and capacity factors have reduced significantly since the baseline date. These reductions were not included in the modeling in order to provide conservative modeling analyses. In addition, there are several increment expanding units that have not been accounted for in the inventory used in the modeling, also in an effort to keep the predicted impacts analysis conservative. Riviera Plant Units 1 and 2 and Cutler Plant Units 3 and 4 are now retired; but, in 1975, these units used considerable quantities of residual oil. Cutler Plant Units 5 and 6 are operated only for system stability using natural gas. These units used over 200,000 barrels of residual oil in 1975. Martin Plant Units 1 and 2 are residual oil and natural gas fired units that were under construction during the baseline date, and the potential emissions from these units are included in the PSD baseline. Currently, these units are operated at only a 34.83 percent capacity factor and would expand the PSD increment. The FPL Fort Myers and Lauderdale plants were the only plants where increment-expanding emissions were considered. Lauderdale Plant Units 4 and 5 and Fort Myers Plant Units 1 and 2 were repowered with natural gas-fired combustion turbines and heat recovery steam generators. The emissions reductions from the steam generating existing units were accounted for in the emissions inventory.

To further support the emissions inventory utilized, air quality data in the vicinity of and within the Everglades NP was reviewed from the baseline date to the latest data available. The data from nearby monitoring stations in Miami-Dade County are shown in Figures NPS 2-1, 2-2, and 2-3 that present maximum (2nd highest) measured 3-hour, maximum (2nd highest) measured 24-hour, and annual average SO₂ concentrations, respectively. Figures NPS 2-4 and 2-5 present the measured 24-hour and annual average SO₂ concentrations, respectively. These data suggest that there were no significant changes in the maximum SO₂ concentrations in Miami-Dade County and within the Everglades NP since the PSD baseline dates.

To evaluate potential increases in SO₂ from mobile sources, information on fuel usage from the minor source baseline date (December 27, 1977) to the present were reviewed using data from Florida Statistical Abstract 2005 (Bureau of Economic and Business research, Warrington College of Business, University of Florida). During this period, there was a 62-percent increase in the use of motor fuels. During the same period, there was a substantial decrease in sulfur content of diesel fuel, the primary fuel with relatively high-sulfur content. Prior to the early 1990s and the baseline date, the sulfur content in diesel fuel was 0.5 percent. In the early 1990s, the sulfur content was reduced by EPA regulation to 0.05 percent. Starting in 2007, the sulfur content of diesel fuel was reduced to 0.0015 percent, which is comparable to gasoline. This makes possible the use of particulate filters and catalysts to reduce NO_x, carbon monoxide (CO), and VOC from new diesel trucks starting with the 2007 model year. The reduction in the sulfur content from the baseline date to present suggests over a 3-fold reduction in SO₂ emissions from mobile diesel sources, despite the increased utilization.

The decrease in SO₂ from mobile and area sources is supported by the recent VISTAS emissions inventory. Tables SO2-2002 and SO2-2009 present the SO₂ emissions for industrial, commercial, and institutional sources, highway and off-highway sources, and miscellaneous sources in southern Florida counties. As shown, the estimated SO₂ emissions from these sources in 2002 is 280,155 TPY; while in 2009, the SO₂ emissions are estimated as 94,188 TPY. This is a decrease of about 186,000 TPY. The decrease in highway and off-highway sources is about 17,000 TPY. The SO₂ emissions decrease in Miami-Dade and Monroe Counties (the location of the Everglades NP) is about 12,700 TPY. In contrast, the maximum potential SO₂ emissions from FGPP are 3,048 TPY and located over 100 km from FGPP. These data clearly suggest a decrease in minor and mobile sources that would expand the increment from the baseline date.

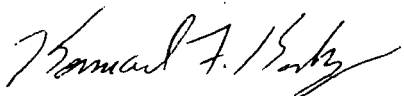
The maximum SO₂ impacts of FGPP within the Everglades NP are low compared to the PSD Class I increments. While the PSD Class I significant impact levels (SILs) are exceeded by FGPP as shown in the Air Construction/PSD Permit Application and PSD Completeness Responses, the frequency of impacts above the PSD Class I SILs are low. A review of the modeling analysis over the 3 years evaluated indicates that the PSD Class I SILs are exceeded only between 4 to 13 days (24-hour periods) per year. Therefore, from 96 to 99 percent of the time the maximum SO₂ 24-hour impacts of FGPP in the Everglades NP are below the SILs.

As explained above, the inventory was based on the use of potential emissions from PSD Increment sources. This assumption provides conservative modeling estimates since actual emissions would be expected to be lower. Minor sources were also included as shown on the inventory listing. Sources with emissions as low as several tons/year were included. The FGPP emissions inventory was built on information submitted for previously approved projects where the impacts are not substantially different from FGPP. SO₂ emissions from industrial, commercial, and institutional sources, highway and off-highway sources, and miscellaneous sources suggest decreases from the baseline data, thus expanding the increment. These reductions were not included in the modeling analysis, indicating the conservative nature of the analysis. The air quality monitoring data support emission inventory used in the PSD Class I Increment analysis, since it demonstrates that there are no significant changes of SO₂ concentrations near the Everglades NP.

Your consideration of this information is greatly appreciated. Please call me or Barbara Linkiewicz of FPL (561-691-7518), if you have any questions on this supplemental information.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal



Robert C. McCann
Principal

KFK/all

Cc: Ms. Barbara Linkiewicz, Director of Environmental Licensing, FPL
Mr. Dan Kimball, Superintendent Everglades National Park
Mr. Dee Morse, NPS Air Resources Division

TABLE SO2-2002
SO2 EMISSIONS ESTIMATED FOR 2002
FOR REGION AROUND GLADES COUNTY
VISTAS DATA

County	SO2 Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Misc.	
Brevard	15,532	1,283	123	16,938
Broward	27,761	3,809	97	31,667
Charlotte	87	456	95	638
Collier	341	613	185	1,139
DeSoto	46	76	0	122
Glades	3	68	32	103
Hardee	52	75	2	129
Hendry	348	94	37	479
Highlands	1,209	193	50	1,452
Hillsborough	67,661	5,130	5	72,796
Indian River	123	326	8	457
Lee	606	1,320	10	1,936
Manatee	29,371	931	16	30,318
Martin	16,328	465	15	16,808
Miami-Dade	22,378	3,150	151	25,679
Monroe	166	327	108	601
Okeechobee	19	104	64	187
Osceola	331	586	173	1,090
Palm Beach	13,346	2,356	26	15,728
Pinellas	24,849	1,417	0	26,266
Polk	32,817	931	116	33,864
Sarasota	362	743	38	1,143
St. Lucie	110	501	4	615
Total	253,846	24,954	1,355	280,155

Source: FDEP 2007

TABLE SO2-2009
SO2 EMISSIONS ESTIMATED FOR 2009
FOR REGION AROUND GLADES COUNTY
VISTAS DATA

County	SO2 Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Misc.	
Brevard	416	344	124	884
Broward	7,673	1,525	153	9,351
Charlotte	88	120	98	306
Collier	343	92	188	623
DeSoto	24	11	2	37
Glades	3	11	49	63
Hardee	14	9	7	30
Hendry	312	15	45	372
Highlands	89	27	50	166
Hillsborough	28,472	2,940	11	31,423
Indian River	98	48	18	164
Lee	380	226	21	627
Manatee	353	302	40	695
Martin	1,955	70	40	2,065
Miami-Dade	11,924	1,138	216	13,278
Monroe	157	52	65	274
Okeechobee	19	16	210	245
Osceola	95	84	146	325
Palm Beach	4,207	346	67	4,620
Pinellas	641	272	1	914
Polk	26,758	128	115	27,001
Sarasota	360	108	57	525
St. Lucie	113	73	14	200
Total	84,494	7,957	1,737	94,188

Source: FDEP 2007

**TABLE BASELINE-PRESENT
FUEL USAGE AND CAPACITY FACTORS FOR FPL
KEY POINT, PORT EVERGLADES, AND RIVIERA PLANTS; 1975 AND**

	Turkey Point	Port Everglades	Riviera
1975			
Heat Input			
Oil (MMBtu/hr)	31,977,365	40,314,352	19,244,213
Gas (MMBtu/hr)	12,239,620	25,737,648	16,439,321
Total	44,216,985	66,052,000	35,683,534
Capacity Factor	69.70%	65.70%	59.80%
2006			
Heat Input			
Oil (MMBtu/hr)	9,729,974	17,813,705	10,855,960
Gas (MMBtu/hr)	15,399,663	16,932,864	9,877,375
Total	25,129,637	34,746,569	20,733,335
Capacity Factor	35.31%	31.94%	40.97%

**FIGURE NPS 2-1
MEASURED 3-HOUR AVERAGE SO₂ CONCENTRATIONS
(2nd Highest Values)
Miami-Dade County**

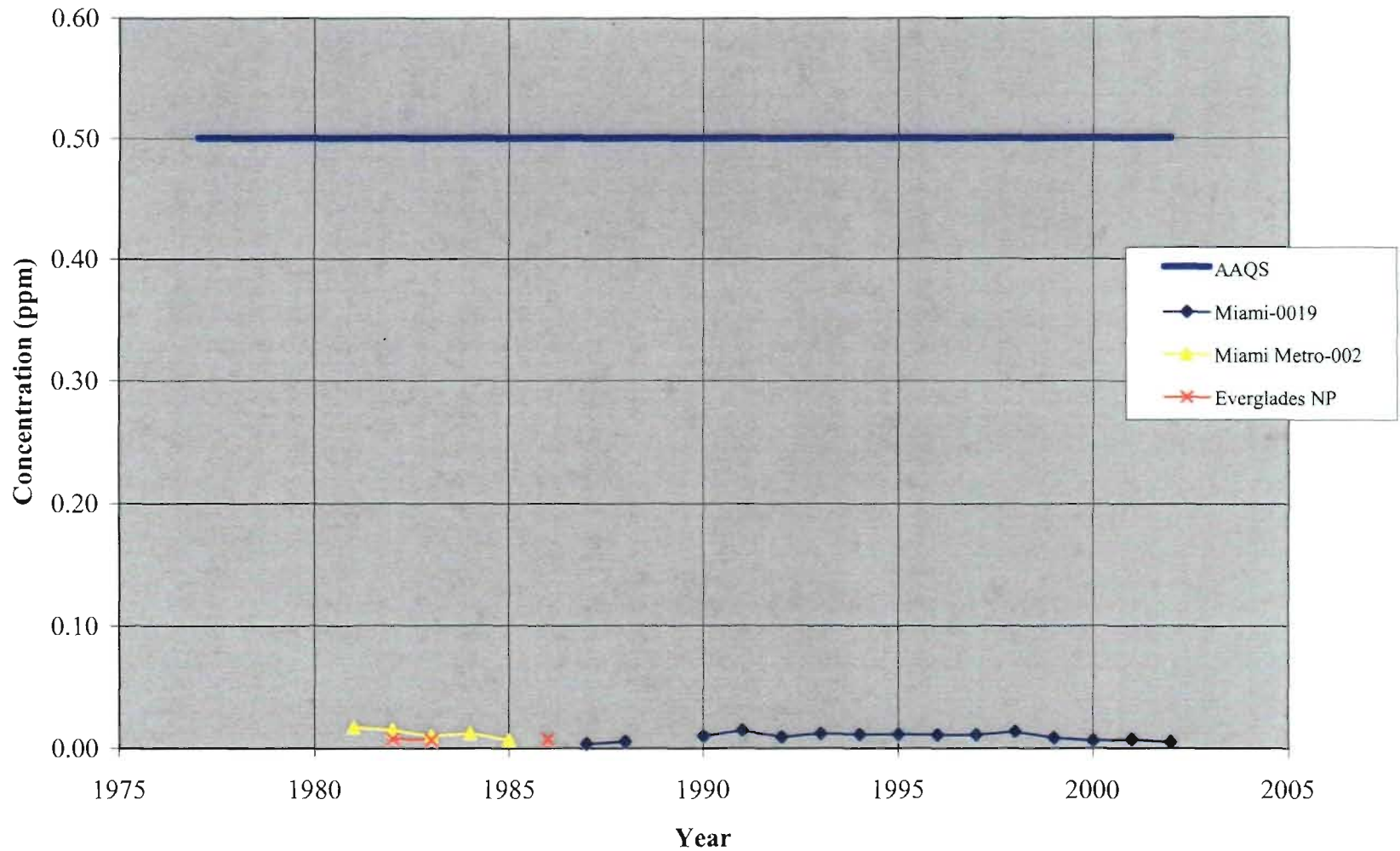
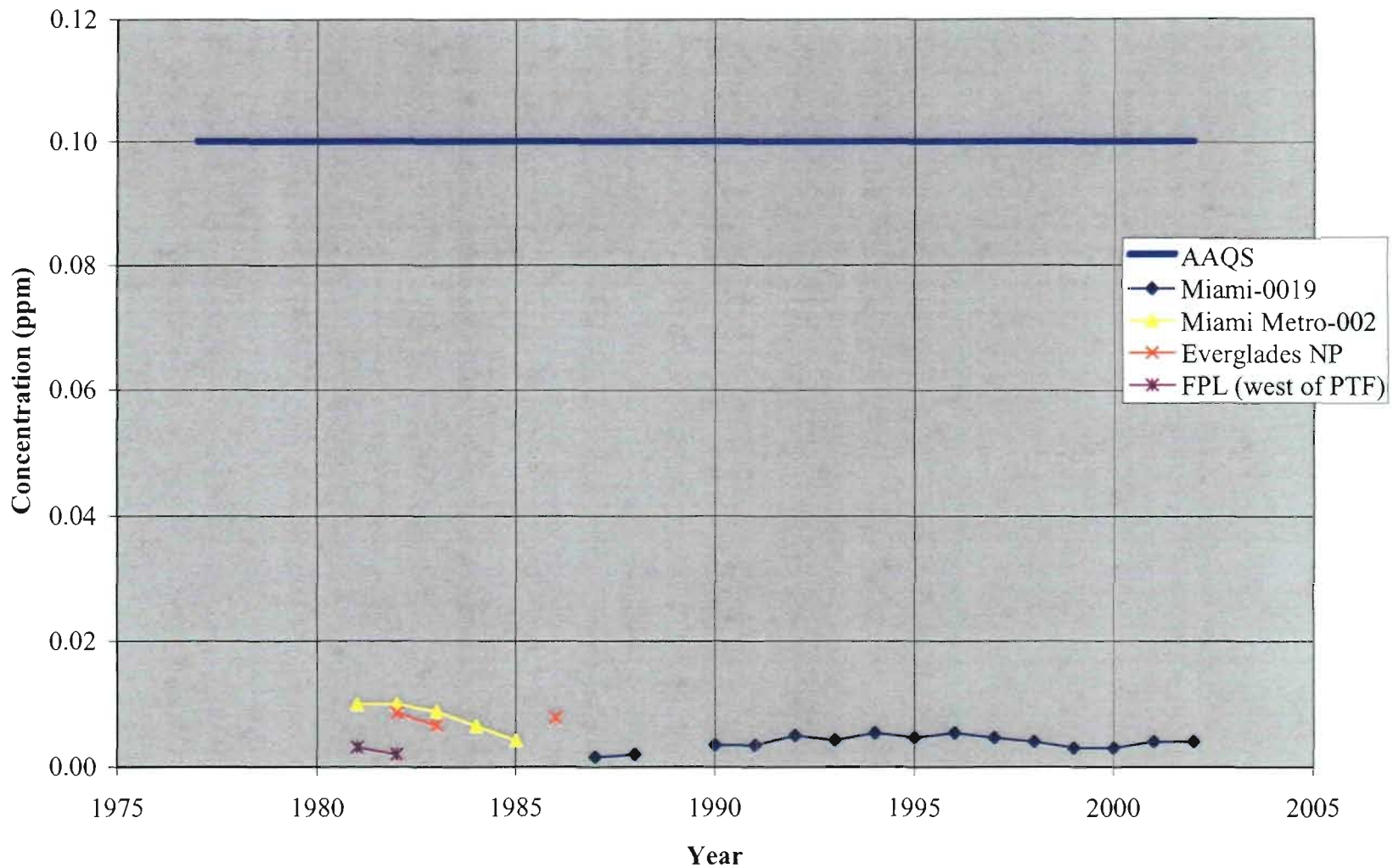
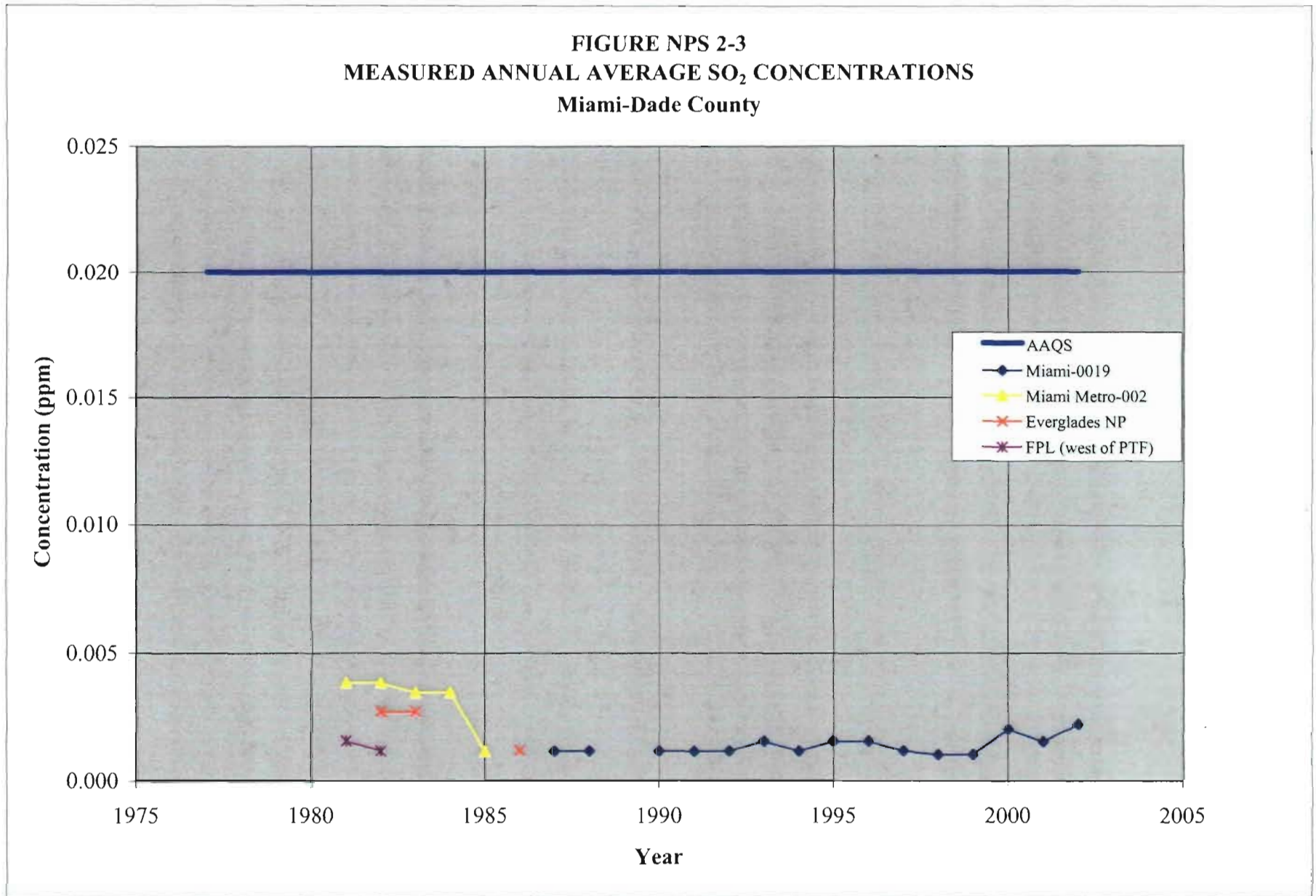


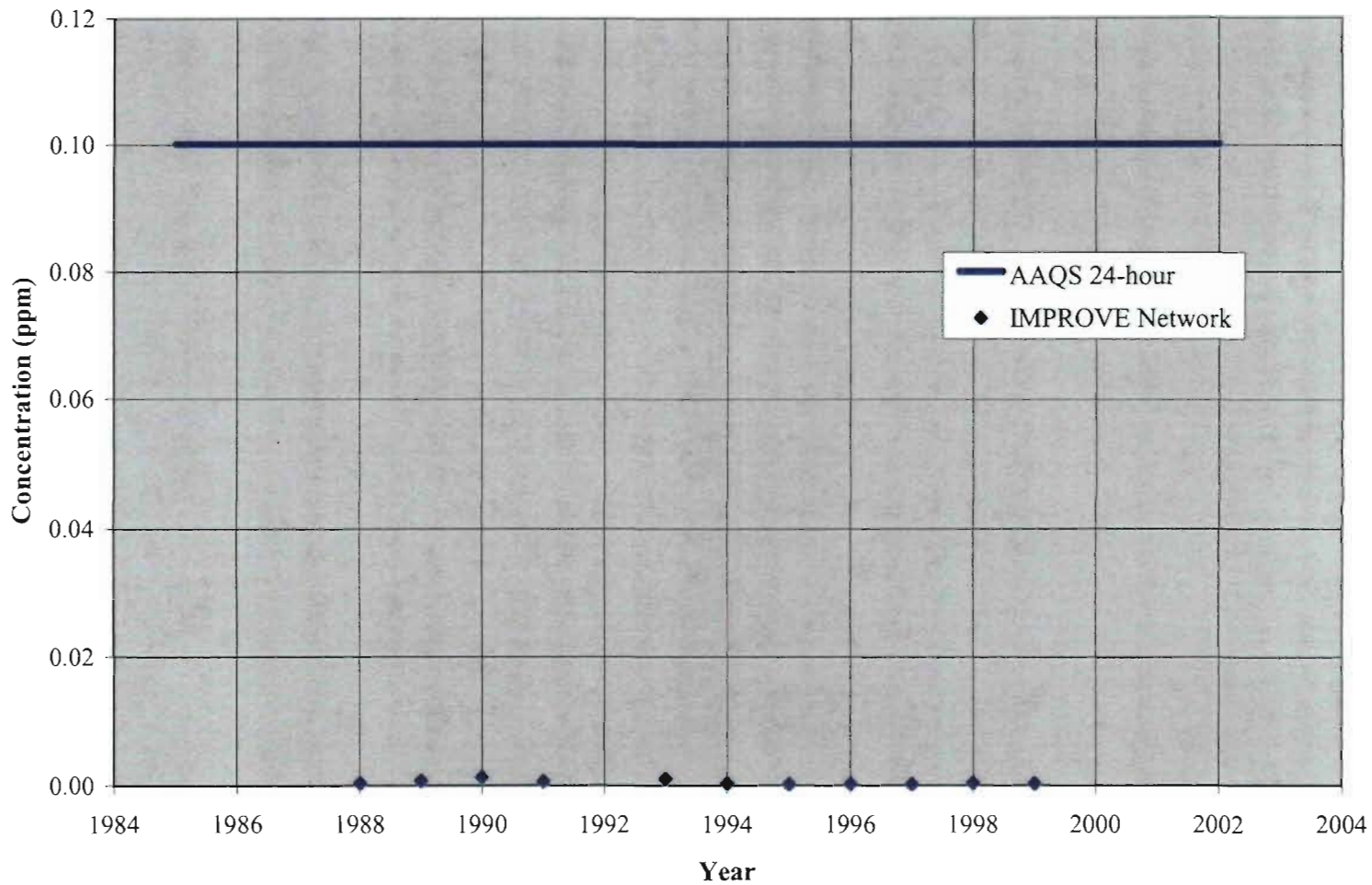
FIGURE NPS 2-2
MEASURED 24-HOUR AVERAGE SO₂ CONCENTRATIONS
(2nd Highest Values)
Miami-Dade County



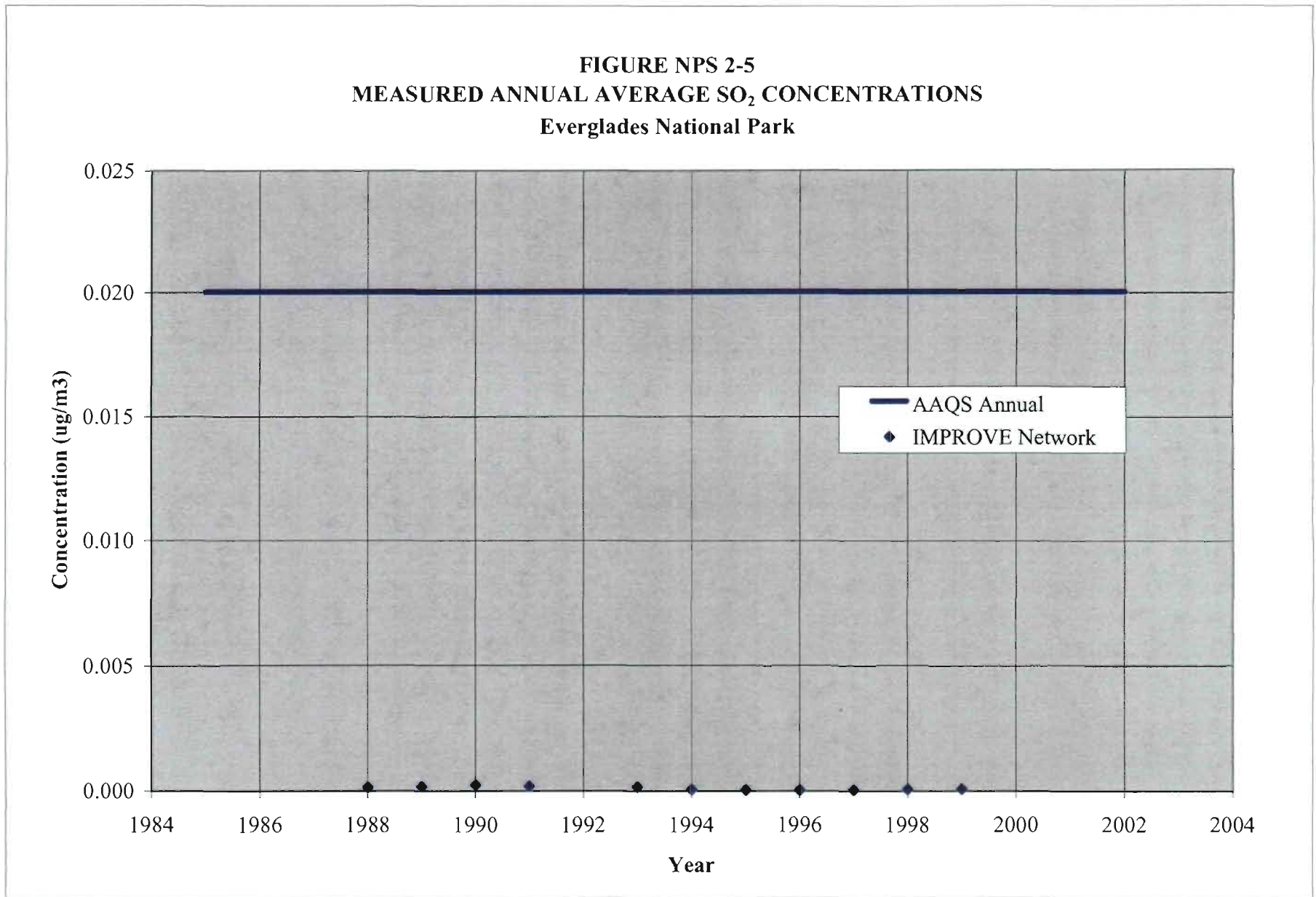
**FIGURE NPS 2-3
MEASURED ANNUAL AVERAGE SO₂ CONCENTRATIONS
Miami-Dade County**



**FIGURE NPS 2-4
MEASURED 24-HOUR AVERAGE SO₂ CONCENTRATIONS
(2nd Highest Values)
Everglades National Park**



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Golder Associates Inc.

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April 9, 2007

0637567-1105

Bureau of Air Regulation, South Permitting Section
Florida Department of Environmental Protection
111 South Magnolia Street
Tallahassee, FL 32399

RECEIVED
APR 10 2007

Attn: Mr. A. A. Linero, Program Administrator

BUREAU OF AIR REGULATION

**RE: FPL GLADES POWER PARK
DEP FILE NO. 0430017-001-AC, PSD-FL-385
SUPPLEMENTAL INFORMATION FOR COMPLETENESS QUESTION FDEP-8**

Dear Mr. Linero:

On behalf of Florida Power & Light Co. (FPL) and as the engineer-of-record for the Air Construction/Prevention of Significant Deterioration (PSD) Permit Application, this correspondence provides additional information related to the Air Construction/PSD Permit Application submitted for FPL Glades Power Park (FGPP). Specifically, this correspondence supplements the information for PSD Completeness Question FDEP-8.

As discussed in the Air Construction/PSD Application and PSD Completeness Responses, FGPP is located in Glades County, which is very rural without many stationary sources of volatile organic compounds (VOC) or nitrogen oxides (NO_x) emissions. The response to FDEP-9 addressed those emissions from counties immediately surrounding Glades County. The total VOC and NO_x emissions for stationary and mobile sources from nearby counties as presented in the response to FDEP-8 (i.e., Glades, Highlands, Hendry, Lee, Charlotte, Okeechobee, Martin, and Palm Beach Counties) were 128,509 tons per year (TPY) and 104,364 TPY, respectively. These data were obtained from the U.S. Environmental Protection Agency (EPA) AirData website for 2001, the latest year of available data.

Ozone formation can be affected by VOC and NO_x emissions that occur from tens of miles to more than 100 miles from a site. To reflect the regional VOC and NO_x emissions in southern Florida, additional emissions information was obtained that included counties located about 80 miles from Glades County. Summaries of the VOC and NO_x emissions estimated for this southern Florida region around Glades County are presented in Tables FDEP-8c and -8d, respectively. Note that these summaries do not include VOC emissions from biogenic sources, which would increase the total VOC emissions in the region.

The VOC emissions increase due to FGPP of about 260 TPY represents less than a 0.05-percent increase in regional VOC emissions. The NO_x emissions increase due to FGPP of about 3,800 TPY represents less than a 0.1-percent increase in regional NO_x emissions.

To further support the conclusions that FGPP will not have a significant effect on the regional emissions of VOC and NO_x, regional emissions information from the VISTAS inventory was compiled for 2002 and 2009. This information is presented in Tables VOC-2002, VOC-2009, NO_x-2002, and NO_x-2009. As shown in these tables the estimated emissions in the region are expected to decrease from 2002 to 2009. For VOCs, the decrease is about 140,000 TPY and for NO_x

the decrease is about 185,000 TPY. Indeed, a decrease in NO_x emissions from mobile and off-highway sources as a result of updated regulations is estimated to be about 90,000 TPY or 20 times higher than FGPP emissions.

Unlike air modeling analyses for pollutants emitted directly from FGPP, there are no recommended air quality models in EPA's Guideline on Air Quality Models [Title 40, Part 51 of the Code of Federal Regulations (40 CFR 51), Appendix W] to evaluate the emissions of VOC and NO_x from a single source of ozone formation. Air quality models that are recommended for ozone are utilized to simulate impacts for large urban areas that have air quality exceeding the ambient air quality standards (AAQS) for ozone. Ozone modeling requires intensive meteorological, source, and ambient air quality data to evaluate episodes of high ozone concentrations in order to develop compliance strategies for meeting the AAQS for ozone. These techniques would not be appropriate to evaluate the impacts from FGPP. These models are validated for regional areas and only provide limited information on the potential impacts from single sources due to the regional scale of these models and the small emission contributions that a single source would have to these large regional areas.

To provide some insight on the potential impacts of a single source of VOCs and NO_x, the recent study conducted for the FDEP, which evaluated the 8-hour ozone concentrations for Pensacola and other areas located along the Florida panhandle, was reviewed. The West Florida Ozone Study (WFOS), initiated in July 2002 and completed in 2004 for the purpose of extending the databases and modeling tools for the Gulf Coast Ozone Study (GCOS), considered various control strategies to examine the effects of specific control measures on 8-hour ozone concentrations. Observed data in the area indicated 8-hour ozone concentrations approaching or above the AAQS. The report, "West Florida Ozone Study (WFOS) Data Analysis and Modeling Study" prepared by Systems Applications, Inc. (January 2004), included a modeling case where changes in NO_x emissions from Gulf Power Company's Plant Crist, Unit 7, were evaluated. The changes evaluated the operation of Unit 7 with and without the use of selective catalytic reduction (SCR). The estimated net NO_x emission decrease for using SCR on Unit 7 is about 20 tons per day (TPD). A summary of the maximum simulated 8-hour ozone concentrations predicted for the Pensacola and Bay County areas with and without SCR on Unit 7 is presented in Table FDEP-8e.

As shown in Table FDEP-8e, the predicted 8-hour concentrations were highly variable reflecting the difficulty in precisely predicting impacts for a single source using regional models. However, some insight can be obtained by evaluating the average changes in predicted concentrations. For the WFOS case that evaluated SCR on Crist Unit 7, the average difference in ozone concentrations resulting from about 20 TPD change in NO_x emissions was from 1 to 2 part per billion (ppb) or 1 to 2 percent. Using a change in NO_x emissions of 10.4 TPD, or equivalent to FGPP's potential NO_x emissions, the change in ozone concentrations would be equivalent to 1 ppb or less in the WFOS.

The observations from the WFOS for a 10.4-TPD change in NO_x emissions is not inconsistent with the air modeling presented in Table FDEP-8b, which presented illustrative ozone concentrations downwind of FGPP. This illustrative analysis conservatively assumed that all the NO_x is converted to ozone. At distances of 10 to 50 kilometers, the maximum ozone concentrations suggested for FGPP using this conservative approach were about 1 ppb or less.

The WFOS was conducted in a region that has continental influences, including source contribution into the region from the west, north, and east. Indeed, the area studied in the WFOS was only a portion of the larger GCOS area where violations of the ozone AAQS are common. In contrast, FGPP is located in the southern peninsula of Florida dominated by a subtropical climate with primary

influences from the Gulf of Mexico and Atlantic Ocean. The observed ozone concentrations in southern Florida are much lower than those observed in the Pensacola area and fully comply with the ozone AAQS. This primarily reflects the differences in meteorological conditions between the areas, since the total regional emissions of VOC and NO_x in the WFOS area and southern Florida region are similar.

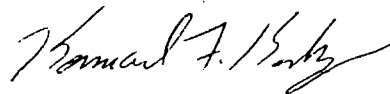
As shown previously in Table FDEP-8a, the air quality data for the three closest FDEP ozone monitors are in full compliance with the AAQS for ozone. The data presented in Table FDEP-8a of the PSD Completeness Responses are well below the AAQS for ozone. These stations are located in Highlands County (Sebring), Lee County (Fort Myers Beach), and Palm Beach County (Royal Palm Beach). The data collected from these sites are similar and are from 12 to 18 ppb less than the 8-hour ozone standard. It should be noted that the air quality data for the three closest FDEP ozone monitors are in full compliance with the AAQS for ozone. The data presented in Table FDEP-8a of the PSD Completeness Responses are well below the AAQS for ozone. These stations are located in Highlands County (Sebring), Lee County (Fort Myers Beach), and Palm Beach County (Royal Palm Beach). The data collected from these sites are similar and are from 12 to 18 ppb less than the 8-hour ozone standard. As noted from the WFOS and the illustrative modeling analysis, the change in ozone concentrations from 10.4 TPD of NO_x emissions would be about 1 ppb or less on a regional scale. This clearly suggests that the NO_x emissions from FGPP will contribute very little to the ozone concentration observed in the southern Florida region.

Taking together the existing air quality data for ozone, regional emissions, and previous ozone studies, the maximum contribution to ozone concentrations in the region due to the emissions of VOCs and NO_x from FGPP are expected to comply with the AAQS for ozone. FGPP will not cause or contribute to an exceedance of the ozone AAQS. Performing regional ozone modeling would not provide any greater quantitative information on ozone prediction than those presented semi-quantitatively using emissions, previous modeling, and air quality comparisons. To demonstrate that the area in the vicinity of FGPP will continue to comply with the ozone AAQS, FPL will agree to perform air quality monitoring for ozone during the construction period and operation of FGPP.

Your consideration of this information is greatly appreciated. Please call me or Barbara Linkiewicz of FPL (561-691-7518), if you have any questions on this supplemental information.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal



Robert C. McCann
Principal

KFK/all

Cc: Barbara Linkiewicz

TABLE FDEP-8c
VOC EMISSIONS ESTIMATED FOR 2001
FOR REGION AROUND GLADES COUNTY

County	VOC Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Other	
Brevard Co	10,252	17,696	715	28,664
Broward Co	26,637	42,481	2,928	72,046
Charlotte Co	1,990	4,592	310	6,892
Collier Co	3,273	9,236	5,732	18,240
DeSoto Co	900	743	232	1,875
Glades Co	206	2,322	1,125	3,653
Hardee Co	651	529	436	1,615
Hendry Co	3,294	1,160	4,835	9,289
Highlands Co	1,883	2,567	427	4,878
Hillsborough Co	24,245	28,549	946	53,740
Indian River Co	2,436	4,278	217	6,931
Lee Co	7,486	16,385	976	24,848
Manatee Co	6,728	7,970	288	14,986
Martin Co	2,961	5,599	257	8,817
Miami-Dade Co	44,351	49,661	3,945	97,957
Monroe Co	1,669	24,030	3,091	28,790
Okeechobee Co	733	1,855	171	2,760
Osceola Co	2,688	4,239	920	7,847
Palm Beach Co	23,185	36,776	7,405	67,366
Pinellas Co	19,788	27,630	198	47,615
Polk Co	16,508	15,385	1,572	33,464
Sarasota Co	7,268	10,051	356	17,675
St. Lucie Co	4,175	6,700	247	11,122
Total	213,306	320,434	37,329	571,069

Source: EPA AIRDATA website (<http://www.epa.gov/air/data/geosel.html>)

TABLE FDEP-8d
NO_x EMISSIONS ESTIMATED FOR 2001
FOR REGION AROUND GLADES COUNTY

County	NO _x Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Other	
Brevard Co	15,941	17,373	324	33,638
Broward Co	20,116	52,361	1,323	73,800
Charlotte Co	150	4,560	141	4,851
Collier Co	206	9,192	2,612	12,011
DeSoto Co	59	971	106	1,136
Glades Co	27	699	309	1,035
Hardee Co	802	919	199	1,919
Hendry Co	1,037	1,434	885	3,357
Highlands Co	678	2,624	194	3,497
Hillsborough Co	58,583	44,423	395	103,401
Indian River Co	264	3,685	99	4,048
Lee Co	9,614	14,802	443	24,860
Manatee Co	10,455	9,015	130	19,600
Martin Co	9,727	4,877	105	14,710
Miami-Dade Co	21,951	55,639	1,790	79,380
Monroe Co	334	4,411	1,409	6,154
Okeechobee Co	48	1,267	78	1,393
Osceola Co	1,859	3,484	419	5,762
Palm Beach Co	12,514	35,725	2,421	50,661
Pinellas Co	12,560	25,548	83	38,191
Polk Co	15,230	17,653	715	33,598
Sarasota Co	387	9,340	161	9,888
St. Lucie Co	724	6,846	112	7,682
Total	193,269	326,848	14,453	534,570

Source: EPA AIRDATA website (<http://www.epa.gov/air/data/geosel.html>)

TABLE FDEP-8e
EXAMPLE OF OZONE MODELING OF CONTROL STRATEGY
FOR SINGLE SOURCE

Period	Area	Maximum 8-Hour Ozone			
		Predicted Concentration (ppb)		Concentration Change (ppb)	Concentration Change (%)
		2007		From 2007	From 2007
		Baseline ^a	Case C7A ^b	Baseline	Baseline
September 1997	Pensacola	103	105	2	1.9%
	Bay County	79	80	1	1.3%
August 1997	Pensacola	109	110	1	0.9%
	Bay County	88	90	2	2.3%
May 1996	Pensacola	90	90	0	0.0%
	Bay County	87	87	0	0.0%
July 1998	Pensacola	83	86	3	3.6%
	Bay County	77	77	0	0.0%
July 2000	Pensacola	140	140	0	0.0%
	Bay County	111	118	7	6.3%
Average	Pensacola			1.2	1.3%
	Bay County			2.0	2.0%

Source: West Florida Ozone Study (WFOS) Data Analysis and Modeling Study”, Systems Applications, Inc. (January 2004)

^a Includes Unit 7 from Gulf Power Crist Plant with SCR

^b Includes Unit 7 from Gulf Power Crist Plant without SCR with an estimated NOx emission increase of about 20 tons per day.

TABLE NOX-2002
NOx EMISSIONS ESTIMATED FOR 2002
FOR REGION AROUND GLADES COUNTY
VISTAS DATA

County	NOx Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Misc.	
Brevard	7,921	20,518	450	28,889
Broward	16,277	54,515	358	71,150
Charlotte	276	6,799	349	7,424
Collier	505	9,292	677	10,474
DeSoto	205	1,191	3	1,399
Glades	19	1,047	117	1,183
Hardee	971	1,389	9	2,369
Hendry	825	1,425	136	2,386
Highlands	1,868	3,461	183	5,512
Hillsborough	55,337	57,269	26	112,632
Indian River	236	5,385	30	5,651
Lee	2,361	19,401	39	21,801
Manatee	10,032	12,302	61	22,395
Martin	8,628	7,435	56	16,119
Miami-Dade	14,474	56,023	553	71,050
Monroe	412	5,000	397	5,809
Okeechobee	70	1,842	235	2,147
Osceola	1,359	9,401	632	11,392
Palm Beach	10,309	38,610	99	49,018
Pinellas	12,310	24,527	3	36,840
Polk	10,864	16,816	425	28,105
Sarasota	470	12,604	142	13,216
St. Lucie	744	8,193	15	8,952
Total	156,473	374,445	4,995	535,913

Source: FDEP 2007

TABLE NOX-2009
NO_x EMISSIONS ESTIMATED FOR 2009
FOR REGION AROUND GLADES COUNTY
VISTAS DATA

County	NO _x Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Misc.	
Brevard	1,694	15,162	455	17,311
Broward	8,635	40,664	561	49,860
Charlotte	276	5,301	361	5,938
Collier	504	7,070	687	8,261
DeSoto	344	879	10	1,233
Glades	20	912	180	1,112
Hardee	1,534	1,013	26	2,573
Hendry	822	1,085	167	2,074
Highlands	212	2,569	184	2,965
Hillsborough	7,870	45,801	47	53,718
Indian River	204	3,886	67	4,157
Lee	1,866	14,683	78	16,627
Manatee	865	9,408	148	10,421
Martin	4,586	5,552	147	10,285
Miami-Dade	9,896	44,869	792	55,557
Monroe	282	4,425	237	4,944
Okeechobee	75	1,415	767	2,257
Osceola	1,480	7,051	533	9,064
Palm Beach	5,968	28,081	246	34,295
Pinellas	6,464	17,354	5	23,823
Polk	5,418	11,876	421	17,715
Sarasota	472	9,125	211	9,808
St. Lucie	727	6,022	52	6,801
Total	60,214	284,203	6,382	350,799

Source: FDEP 2007

TABLE VOC-2002
VOC EMISSIONS ESTIMATED FOR 2002
FOR REGION AROUND GLADES COUNTY
VISTAS DATA

County	VOC Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Misc.	
Brevard	12,952	29,178	1054	43,184
Broward	37,981	58,349	819	97,149
Charlotte	3,101	10,049	1008	14,158
Collier	5,802	13,074	1494	20,370
DeSoto	1,231	1,151	242	2,624
Glades	300	6,335	606	7,241
Hardee	850	1,441	216	2,507
Hendry	3,594	2,084	341	6,019
Highlands	2,881	5,926	750	9,557
Hillsborough	8,700	64,340	92	73,132
Indian River	3,236	6,716	172	10,124
Lee	10,267	27,269	89	37,625
Manatee	8,953	11,984	313	21,250
Martin	4,481	10,088	315	14,884
Miami-Dade	49,968	71,952	1244	123,164
Monroe	2,261	20,497	897	23,655
Okeechobee	1,026	4,597	778	6,401
Osceola	4,152	13,911	1861	19,924
Palm Beach	29,975	53,355	3991	87,321
Pinellas	24,386	34,172	14	58,572
Polk	19,660	22,374	1071	43,105
Sarasota	8,652	15,257	470	24,379
St. Lucie	6,306	10,001	119	16,426
Total	250,715	494,100	17,956	762,771

Source: FDEP 2007

TABLE VOC-2009
VOC EMISSIONS ESTIMATED FOR 2009
FOR REGION AROUND GLADES COUNTY
VISTAS DATA

County	VOC Emissions (TPY)			Total
	Industrial, Commercial, Institutional	Highway, Off-Highway	Misc.	
Brevard	13,319	20,213	1,105	34,637
Broward	39,936	38,694	1,277	79,907
Charlotte	3,062	7,344	1,115	11,521
Collier	5,906	9,262	1,582	16,750
DeSoto	1,181	806	289	2,276
Glades	307	4,821	645	5,773
Hardee	876	974	245	2,095
Hendry	3,381	1,543	476	5,400
Highlands	2,901	4,387	708	7,996
Hillsborough	30,066	29,890	146	60,102
Indian River	3,258	4,621	216	8,095
Lee	10,592	19,183	175	29,950
Manatee	8,385	8,398	473	17,256
Martin	4,345	7,093	474	11,912
Miami-Dade	52,637	48,698	1,786	103,121
Monroe	2,270	16,057	540	18,867
Okeechobee	1,048	3,461	1,849	6,358
Osceola	4,277	10,095	1,583	15,955
Palm Beach	31,053	35,879	4,257	71,189
Pinellas	25,621	22,808	16	48,445
Polk	19,326	15,300	1,067	35,693
Sarasota	8,961	10,459	619	20,039
St. Lucie	6,207	6,914	236	13,357
Total	278,915	326,900	20,879	626,694

Source: FDEP 2007