

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 14, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Reichel
General Manager
FPL Fort Myers Plant
Post Office Box 430
Fort Myers, Florida 33905

Re: FPL Ft. Myers Repowering Project
Temporary Boiler for Manatee Warming
DEP File No. 0710002-011-AC

Dear Mr. Reichel:

The Department received a letter from Mr. Richard Piper dated December 10, 2001, informing us of the need for the temporary installation of a portable boiler from January to March due to low flow of warm water associated with the operation of the six combustion turbines in the simple cycle-mode only. This boiler will maintain the discharge canal water temperature of 68 degrees F during the winter month, so as not to endanger the population of manatees that may be present in the area. Mr. Piper claims an exemption from permitting pursuant to Rule 62-210.300(3)(a) 21 F.A.C.

We agreed with Mr. Piper that this unit is exempt from permitting as long as the total fuel consumption will not exceed 32,000 gallons per year of distillate fuel not exceeding 0.05% sulfur content by weight. It is our understanding that your facility is under the final stages of the construction of the repowering project.

If you have any questions regarding this matter, please contact Teresa Heron at 850/921-9529 or teresa.heron@dep.state.fl.us. You can also contact me at 850/921-9523 or alvaro.linero@dep.state.fl.us.

Sincerely,

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

AAL/aal

Cc: Rich Piper, FPL
Ron Blackburn, DEP SD

"More Protection, Less Process"

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1. Article Addressed to:

Mr. William Reichel
 General Manager
 FPL Fort Myers Plant
 P. O. Box 430
 Ft. Myers, FL 33905

2. Article Number (Copy from service label)
 7001 0320 0001 3692 8536

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1-30-02

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Mr. William Reichel

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FPL

RECEIVED

DEC 14 2001

December 10, 2001

BUREAU OF AIR REGULATION

Ms. Teresa Heron, P.E.
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Re: FPL Fort Myers Repowering Project
Temporary Boiler for Manatee Warming**

Dear Teresa:

Pursuant to our recent telephone conversations, this correspondence is to inform the Department that FPL intends to lease a small, portable boiler at the Fort Myers facility during the months of January through early March 2002.

As we discussed, the endangered West Indian manatee has for many years congregated in large numbers each winter in the vicinity of the Fort Myers plant discharge canal. The animals have been attracted to the steady flow of warm water (approximately 450,000 gallons per minute) being discharged from the plant's cooling system.

This winter is a critical one for the manatees. Due to the Repowering Project construction sequence, FPL is currently only able to operate the auxiliary equipment cooling water system for the facility (approximately 14,000 gallons per minute), since the large, oil-fired boilers have been permanently shut down. The auxiliary equipment cooling water system is used to cool hydrogen coolers and other auxiliary equipment associated with operating the six combustion turbines recently installed at Fort Myers as part of the Repowering Project.

The six combustion turbines are operating in simple-cycle mode only, this winter (no steam generation). In the spring of 2002, when the weather moderates, FPL plans to make the steam system connections between the newly-installed heat recovery steam generators (HRSG's) and the pre-existing steam turbines which have been an integral part of the Fort Myers plant for many years. Upon completing and testing the steam system tie-in, the facility will be able to commence operation as a fully combined-cycle facility, and resume the "normal" flow of warm water (approximately 450,000 gpm).

Because of the history of manatees congregating in the vicinity of the plant discharge canal, as part of the facility's NPDES permit, a Manatee Protection Plan was required to be developed and implemented. The plan requires FPL to endeavor to maintain a discharge canal water temperature of 68°F during the winter months, so as not to endanger the population of manatees that might be present.

FPL has carefully assessed the historic air and water temperatures in Lee County for the past several years, and believes that if Florida experiences a normal-to-moderate winter, the existing facility cooling system will be adequate to maintain the water temperature in the discharge canal. However, if the winter is particularly cold, the existing auxiliary equipment cooling water system may need to be augmented; therefore FPL plans to maintain a temporary portable boiler onsite for contingency purposes.

The proposed portable boiler will be leased for the months of January through March. The unit will fire distillate fuel oil at a rate of 55 gallons per hour. Based upon the projected operating hours, the unit would qualify for an exemption from permitting under rule 62-210.300(3)(a)21.

Please note that the need for this temporary unit is for the winter of 2001-2002 only; in future winters, the normal plant cooling water system will suffice to keep the water adequately warm. Moreover, FPL is only bringing the unit to the Fort Myers site on a contingency basis; it is quite possible that it may never be operated at all, depending upon weather conditions.

I would be pleased to answer any questions you may have. At your convenience, please feel free to contact me at (561) 691-7058 or via email at rich_piper@fpl.com.

Very truly yours,



Richard Piper
Environmental Services
Florida Power & Light Company

cc:

Ron Blackburn

FDEP South District Office

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PS Form 3811, July 1999

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**U.S. Postal Service
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Mr. William Reichel **OFFICIAL USE**

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 Ft. Myers, FL 33905

PS Form 3800, January 2001

See Reverse for Instructions