



July 23, 2003

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Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

BUREAU OF AIR REGULATION

RE: Manatee Power Plant FDEP Air Permit No. 08100100-008-AV
PSD Applicability Report

Dear Ms. Vielhauer:

Pursuant to Specific Condition A.40 of the above referenced permit, FPL submits the following PSD Applicability Report. The PSD Applicability Report is required as a result of adding natural gas as a permitted fuel to Manatee Units 1&2. The report is required to be submitted for five years that are representative of normal post-change operation following the addition of natural gas. Natural gas was added to Unit 2 during 2002 and to Unit 1 in 2003.

Table 1 below summarizes the 2002 Actual Emissions compared to the "Past Actual Emissions" (Years 2000 & 2001 average) for the Manatee Plant.

Pollutant	Past Actual Emissions (Years 2000 & 2001 Average) Tons per Year	2002 Actual Emissions	Calculation Methods
Carbon Monoxide (CO)	18,987	20,214	AOR (oil), Initial Performance Test (gas)
Nitrogen Oxides (NOx)	8762	8252	EPA Scorecard
Particulate Matter (PM)	2384	2500	AOR (oil), Initial Performance Test (gas)
Sulfur Dioxide (SO ₂)	31,753	32,701	EPA Scorecard
Volatile Organic Compounds (VOC)	149	160	AOR (oil), Initial Performance Test (gas)

Table 1

With the exception of NOx, all 2002 Actual Emissions increased over the Past Actual Emissions. The decrease in NOx in 2002 is attributed to the full implementation of the Low NOx burner retrofit. During the "Base Year" the NOx emissions, 8762 tons, are reflective of only a partial implementation of the burner retrofit project (Unit 2) which occurred late in 2001.

The increases in the other emissions are unrelated to the physical change of adding natural gas as a permitted fuel, but rather, the result of Manatee Plant's increased utilization to meet load demands during 2002.

In 2002 the generation and fuel oil usage at Manatee Plant Units 1&2 increased 6% over the 2000 & 2001 (Base Year) average (Ref. Figs. 1 & 2 below).

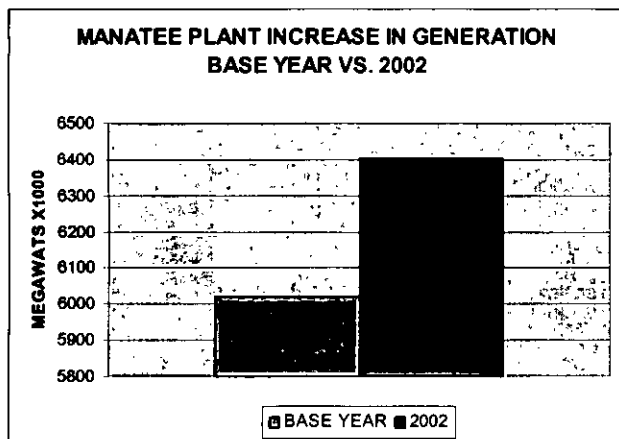


Fig. 1

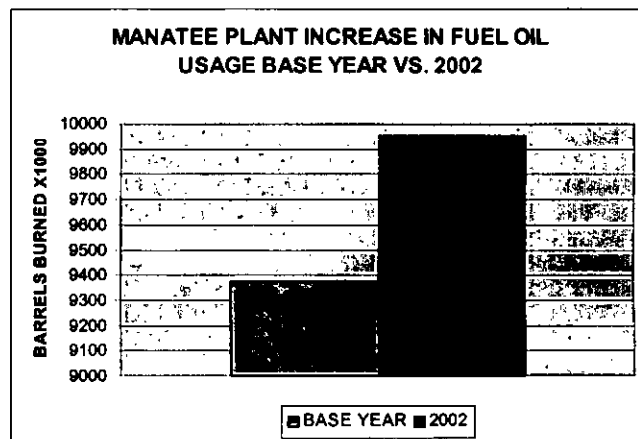


Fig. 2

In 2002 natural gas represented only 0.08% of the fuel used at Manatee (Ref. Fig. 3 below). Considering natural gas fuel was an insignificant percentage of the total fuel in 2002, and it's inherently "clean burning" characteristics, the increase in emissions were driven completely by the increase in utilization due to electricity demand.

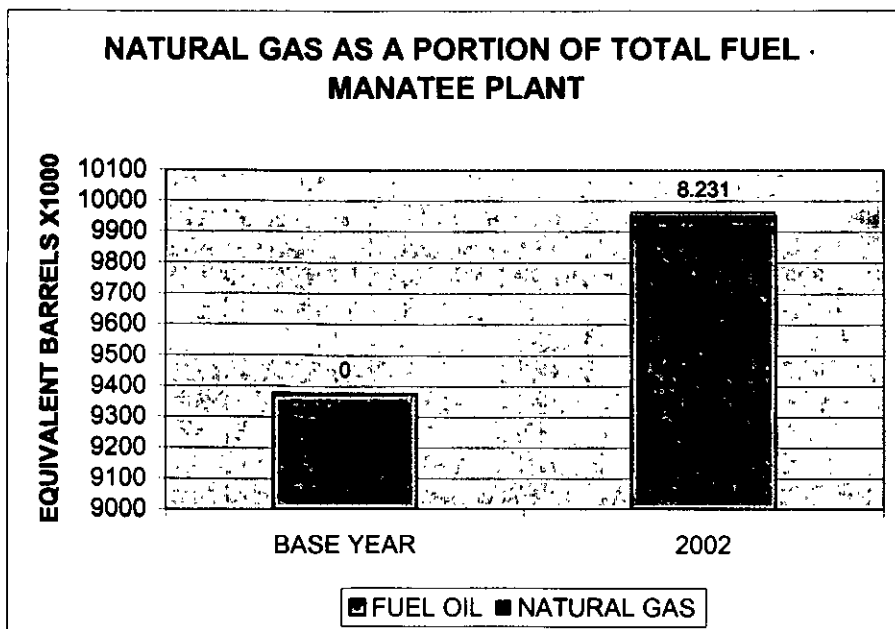


Fig. 3

In accordance with Specific Condition A.40.b and 40 CFR 52.21(b)(33)(ii), Table 2 below shows the 2002 annual emissions excluding the portion of emissions that are unrelated to the physical change of adding natural gas to Units 1&2.

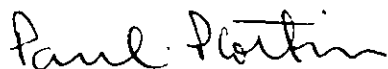
Pollutant	Past Actual Emissions (Years 2000 & 2001 Average) Tons per Year	2002 Actual Emissions Tons	2002 Actual Emissions Excluding Emissions Unrelated to The addition of Natural Gas
Carbon Monoxide (CO)	18,987	20,214	14
Nitrogen Oxides (NOx)	8762	8252	(510)
Particulate Matter (PM)	2384	2500	(34)
Sulfur Dioxide (SO ₂)	31,753	32,701	(1015)
Volatile Organic Compounds (VOC)	149	160	1

Table 2

From the table, the insignificant increases in CO and VOC are more than offset by the decreases in the other pollutants, and are most likely associated with process variability throughout the year, rather than directly attributable to natural gas firing.

In summary, the addition of natural gas to Manatee Units 1&2 did not cause a significant increase in annual emissions and should not be subject to PSD review. Should you have any questions, or require additional information, please feel free to contact me at (941) 776-5211 or Kevin Washington at (561) 691-2877.

Sincerely,



Paul Plotkin
Plant General Manager

cc: A. A. Linero, P.E. Administrator New Source Review Section, DEP
James Cleary, Department of Environmental Protection Southwest Florida District
Rob Brown, Manatee County Environmental Management Department