Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

FACSIMILE TRANSMISSION SHEET

DATE 11-21-03

TO: TRINA VIELHAUER

Department Damm

Phone _____ Fax _____

FROM: JERRY KISSEL
DEP Southwest District Office - Air Program
Phone: (813) 744-6100 (SunCom 512-1042) Ext. _____

OPERATOR: _____

SUBJECT: _____

Total Number of Pages, Including Cover Page: 2

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458
(Suncom) 512-1073

Subj: **Nov.25th meeting**
Date: 11/21/03 1:25:02 PM Eastern Standard Time
From: Eli)w46fl
To: Gerald.Kissel@DEP.State.FL.us

Sorry!

Dear Gerry,
This letter confirms our conversation of a few minutes ago. We,hereby, request the pleasure of your company at a meeting of the Manatee County Clean Air Coalition onTuesday, November 25, 2003 at 4PM. Location. Rosedale Golf & Country Club, East, Bradenton, Florida 34211.
Directions: One quarter mile East of intersection of I-75 and SR 70. Then, East on Route 70 At Hess Station turn left. Meeting is being held in the 19th Hole Meeting Room. At the security gate state your name and purpose of visit. Your name should be on guard's list.
There will be reps there from Sierra Club, Manasota 88,National Environmental Trust,MACAP, and FPL.
Discussions on monitoring are expected to take place, particularly Nox emissions, and opacity regarding "real time".
In a few minutes I'll be faxing material to you.
Thank you!
Clarence Troxell

RCVD. - EMISSIONS DATA, NEWSPAPER ARTICLES, ETC.
-JK 11/21

FPL
Manatee

Department of
Environmental Protection

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

Jeb Bush
Governor

David B. Struhs
Secretary

October 22, 2003

Robert Minning
R.C. Minning & Associates, Inc.
1135 S. Pasadena Ave. Ste. 223
St. Petersburg, Florida 33703

Dear Bob,

I wanted to thank you for your assistance with our Title V Renewal public meetings in Riviera Beach and Manatee County. I thought both meetings went extremely well and I appreciate your time and effort in making it a success.

Sincerely,

Trina Vielhauer

cc. Scott Sheplak

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
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October 22, 2003

Rob Brown
Manatee County Environmental
Management Department
Air Quality Division
202 Sixth Avenue East
Bradenton, Florida 34208

Dear Rob,

I wanted to thank you for your assistance with DEP's FPL Manatee Title V Renewal public meeting. I thought the meeting went extremely well and I appreciate your time and effort in making it a success.

Sincerely,

Trina Vielhauer

cc. Scott Sheplak

Department of Environmental Protection

Jeb Bush
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Twin Towers Office Building
2600 Blair Stone Road
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David B. Struhs
Secretary

October 22, 2003

Jerry Kissel
Southwest District Office-Air
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Jerry,

I wanted to thank you and Joel for your assistance with our FPL Manatee Title V Renewal public meeting. I thought the meeting went extremely well and I appreciate your time and effort in making it a success.

Sincerely,

Trina Vielhauer

cc. Scott Sheplak
Joel Smolen, SWD

Article published Oct 16, 2003

High pollution levels at FPL's Parrish plant are a health threat

For many years, Florida Power & Light Co. and the Florida Department of Environmental Protection have abused the citizens of Manatee and Sarasota counties with the operation of FPL's massive power plant in Manatee.

In the 1990s, FPL tried to introduce the use of Orimulsion, a manufactured toxic fuel from Venezuela. Its use was approved and endorsed by the DEP. But, through the efforts of many people, the use of Orimulsion was defeated.

Unfortunately, the time has come again when such grass- roots actions must be repeated. FPL and the DEP haven't learned, and our pols in Tallahassee haven't helped.
For example, at a meeting conducted by FPL in 1994, Lamar Parrish, a citrus grove owner and a former member of the Manatee County Commission, raised the issue of citrus burn. Jerry Kirk, general manager of the Orimulsion project, said FPL was aware of the problem and was working with the county to find the causes.

Kirk said the Martin County plant, which is just about on the same latitude as the Manatee plant and is surrounded by orange groves, did not have problems with citrus burn.
He said "there's never been any indication of that there, and we are burning the same oil there as we're burning here at the Manatee plant, and yet this is the only area where we can find that kind of problem."

FPL misled the public. Since 1985, FPL has been burning natural gas in combination with fuel oil at the Martin plant. That makes a big difference.

The Manatee plant didn't have natural gas then, but it does now. If, in the year 2002, FPL had operated the Manatee plant on the same basis as Martin, it could have reduced the nitrogen oxide emissions by 45 percent and the amount of sulfur dioxide by 53 percent.
Again, in 2002, the Manatee plant was the dirtiest plant in the entire FPL system. This one plant produced 19.8 percent of the nitrogen oxide and 33 percent of the sulfur dioxide of all the FPL plants.

At a Manatee County Commission meeting Sept. 30, FPL officials said a 33 percent reduction in emissions is likely using a process called "reburn" on the No.1 and No.2 units, but they said they are hesitant to commit to it in the upcoming renewal of the plant permit.
Even if they can reach that 33 percent objective, the No.1 and No.2 units at Manatee will still be higher than the No.1 and No.2 units at Martin.

Talking about the reburn process on July 24, 2002, Allan Bedwell, DEP deputy secretary, told a meeting of the Coalition for Clean Air, "I have not seen that anywhere else in the country."
So we're going to be guinea pigs again.
The 30-day rolling average in monitoring pollution from the Manatee No.1 and No.2 stacks should also be abandoned. The reporting should occur on an hourly and daily basis, the same as for Martin No.1 and No.2.

Changing to 30-day rolling averages has allowed high amounts of nitrogen oxide emissions. It doesn't take a medical genius or a research physicist to determine that detrimental effects would

be greater. It also explains why the Manatee units' emissions are so much higher than any of the other FPL plants.
On Sept. 20, USA Today reported: "Health studies show that inhaling soot particles, which can be 40 times smaller than a grain of salt, contributes to heart problems, lung cancer and asthma. Soot can get deep into the lungs and then the bloodstream. It can even lead to irregular heartbeats and trigger heart attacks. People with heart and lung disease, children with asthma and seniors are considered most vulnerable to the effects of soot."

FPL's Port Everglades plant in Broward County is going through a technical evaluation, which involves emissions of particulate matter. Because of concern over the amount of particulates from that plant, FPL has agreed to lower the levels. There will be an expected reduction of 4,800 tons per year. And the visible emissions will be reduced from 40 percent to 20 percent opacity.
In 2002, Port Everglades burned 5,781,465 units of oil. Manatee burned 9,964,943 units. Martin has been regulated to a 20 percent opacity level; Manatee is regulated at 40 percent opacity.

We in Manatee and Sarasota are being kicked around by FPL and the DEP.
We want clean air. The public must speak out.
Clarence Troxell is a member of the Clean Air Coalition, a group composed of local environmental organizations. He lives in Parrish.

HERE'S THE FAX!!!

TO: Ms Cindy Phillips

COMPANY: FDEP

FAX #: 1-(850) 922 6979

FROM: Clarence Troxell

DATE: 10/17/03

OF PAGES INCLUDING COVER SHEET: 2

COMMENTS: Tried to fax this article to Scott Sheplak this morning but it wouldn't go through. On the accompanying fax letter I said "Let's do something - don't rubber stamp!" Please give copy to Tina! Thank you.

Clarence

IF ALL PAGES ARE NOT RECEIVED, PLEASE CONTACT CLARENCE TROXELL AS SOON AS POSSIBLE.

FAX NUMBER: (941) 776-2047

High pollution levels at FPL's Parrish plant are a health threat

CLARENCE TROXELL

GUEST COLUMNIST

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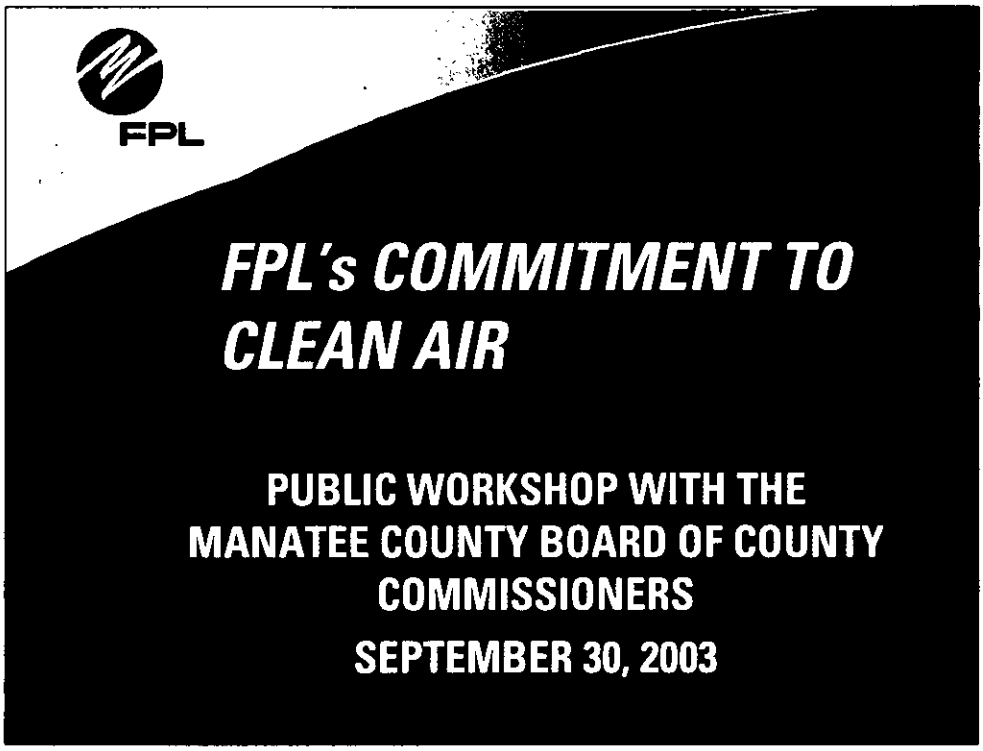
Clarence Troxell is a member of the Clean Air Coalition, a group composed of local environmental organizations. He lives in Parrish.

Herald-Tribune

Thurs. - Oct 16, 2003



PAUL PLOTKIN PLANT GENERAL MANAGER FOR FPL'S MANATEE POWER PLANT.

INNOVEST IS A COMPANY THAT PROVIDES FINANCIAL ANALYSES ON COMPANIES THAT ARE HIGHLY REGARDED ENVIRONMENTALLY.

THEIR PREMISE IS THAT SOUND ENVIRONMENTAL STEWARDSHIP IS AN ASSET WHICH INCREASES THE VALUE OF A COMPANY BY LOWERING ENVIRONMENTAL EXPOSURE AND RISK.

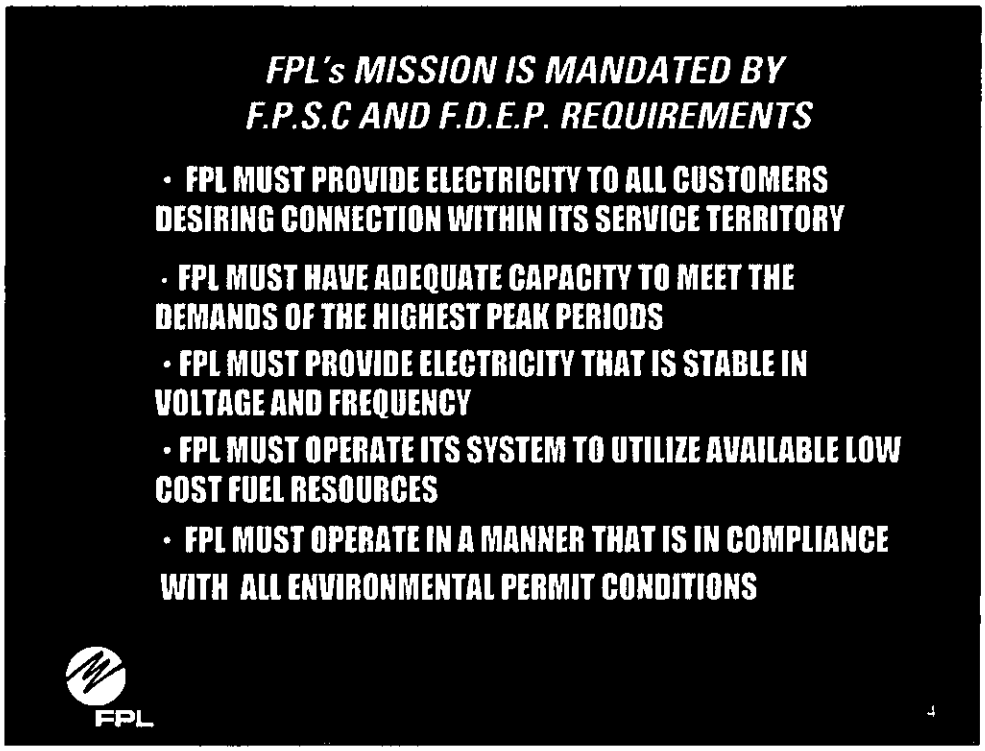
FRANK DIXON IS THE PRESIDENT OF INNOVEST

FPL IS RECOGNIZED NATIONALLY FOR ITS ENVIRONMENTAL PERFORMANCE

- **FPL GROUP WAS NAMED THE 2003 WINNER OF THE EDISON AWARD, THE ELECTRIC POWER INDUSTRY'S HIGHEST HONOR.**

- "FPL Group's winning strategy clearly demonstrates that environmental excellence and outstanding financial performance can go hand in hand."

  THOMAS R. KUHN - PRESIDENT
  EDISON ELECTRIC INSTITUTE
  JUNE 2003

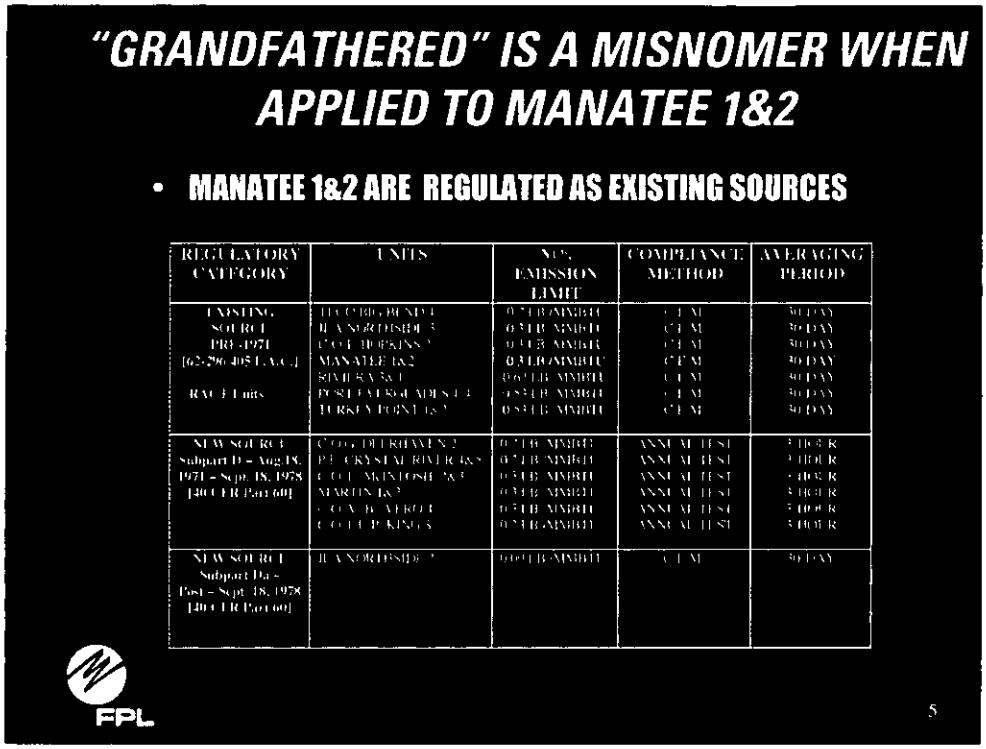


These are MANDATED REQUIREMENTS of the Florida Public Service Commission and the Florida Department of Environmental Protection.

The bottom two are essential to our discussion today.

That we are required to operate our system to utilize AVAILABLE, LOW COST FUEL RESOURCES.

And that we must operate our facilities in compliance with all environmental permit conditions.



There were some comments made about HOW THE MANATEE PLANT was permitted so the next two slides will address the facts. This slide demonstrates how the PERMIT RULES were promulgated.

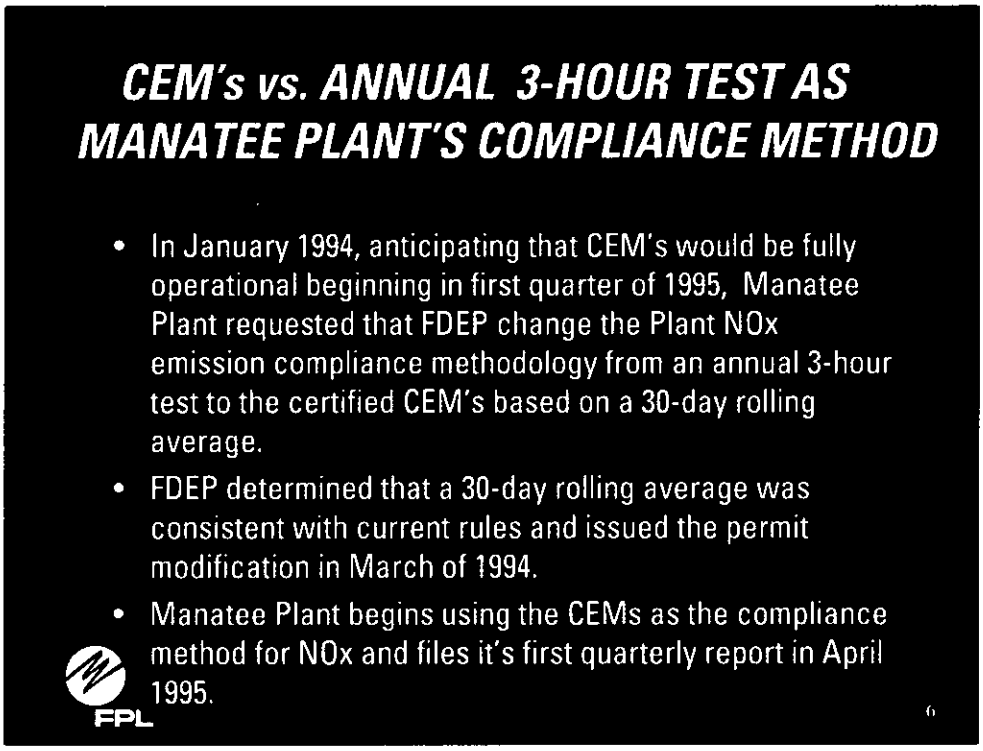
The rules that apply to power plants vary depending on the date the facilities initiated construction. The left column describes the Regulatory Category.

AND the Manatee Units along with 3 other units in Florida were EXCLUDED from REGULATION under Federal rules. These units WERE TO BE considered "grandfathered" by the Clean Air Act.

However, Florida developed an "Existing Sources" category under state rules with applicable emissions standards to prohibit those units from "falling through the crack".

Florida's NOx rules provided for a 30-day averaging period for existing sources. That STANDARD IS the same as Federal standards for the newest conventional units. (The Subpart Da Units or the bottom row – POST 1978)

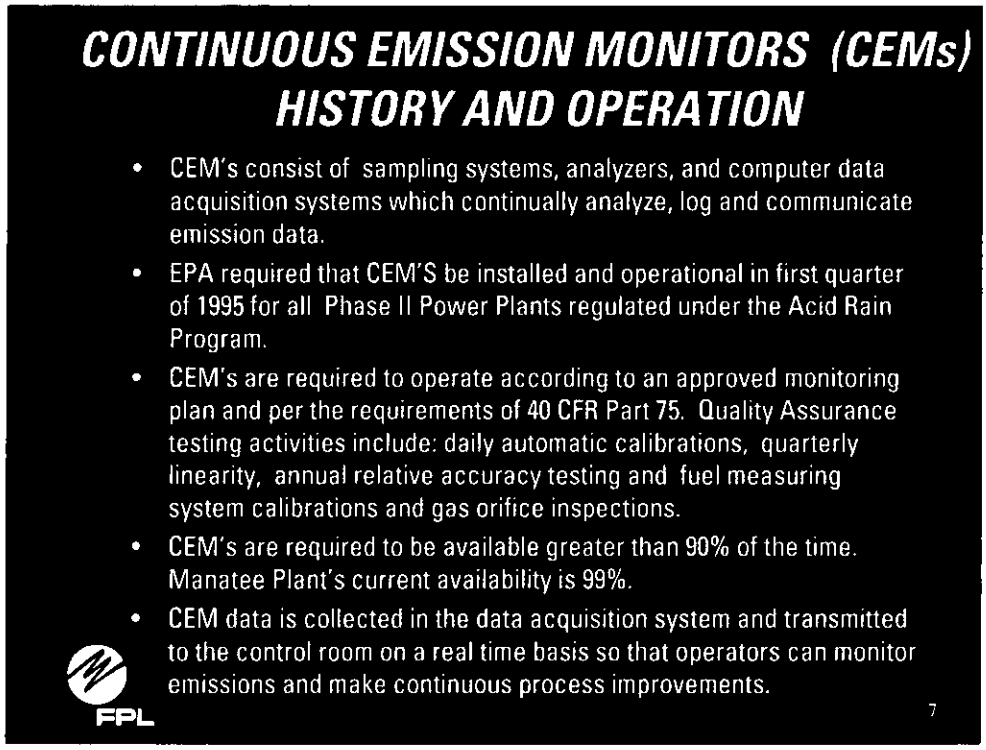
AND then there was a seven year period where a group of New Sources including Martin 1 & 2 fell under different rules.



CONTINUOUS MONITORING is just that….When the unit is operating, the emissions are continuously MONITORED AND RECORDED.

CONTINUOUSLY MONITORING EMISSIONS is more restrictive than the annual emissions compliance test.

THESE EMISSIONS MONITORS are operated, maintained, calibrated, and audited according to the federal standards of the Clean Air Act for CEM systems which assures their accuracy, repeatability and reliability.

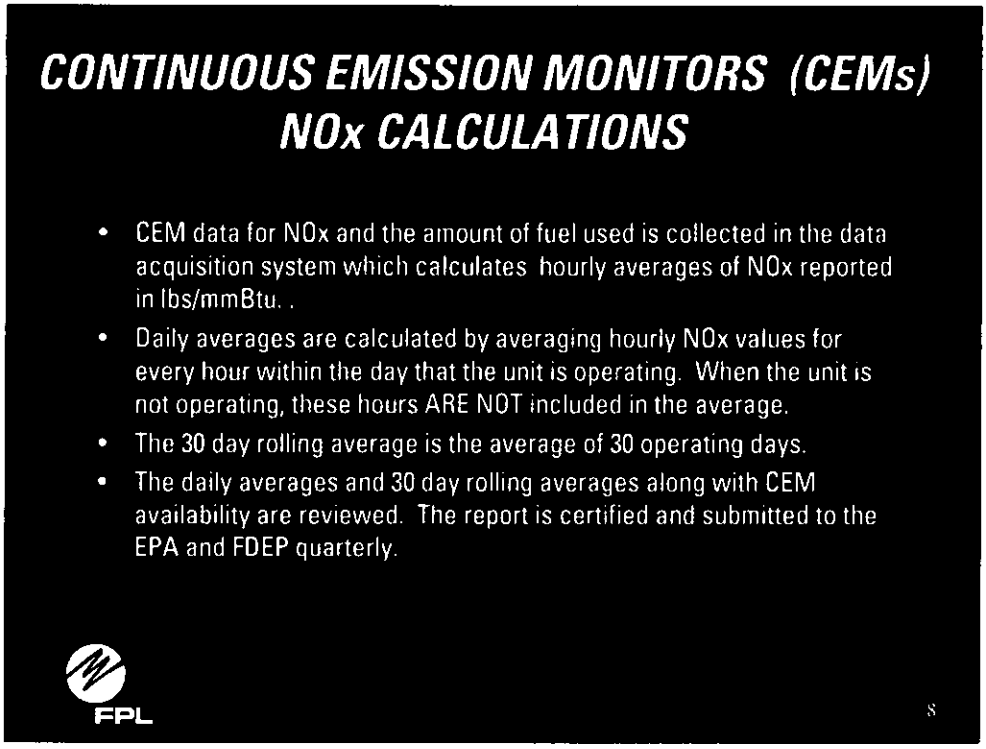


The CEMS are required to operate according to an approved monitoring plan.

AND Our quality assurance processes include DAILY automatic calibrations, QUARTERLY linearity checks and ANNUAL accuracy testing and certification.

CEMS are required to be available > 90% of the time and Manatee Plant's current availability is 99%.

The data is transmitted to our control room on a real time basis so that operators can monitor and make CONTINUOUS PROCESS IMPROVEMENTS.



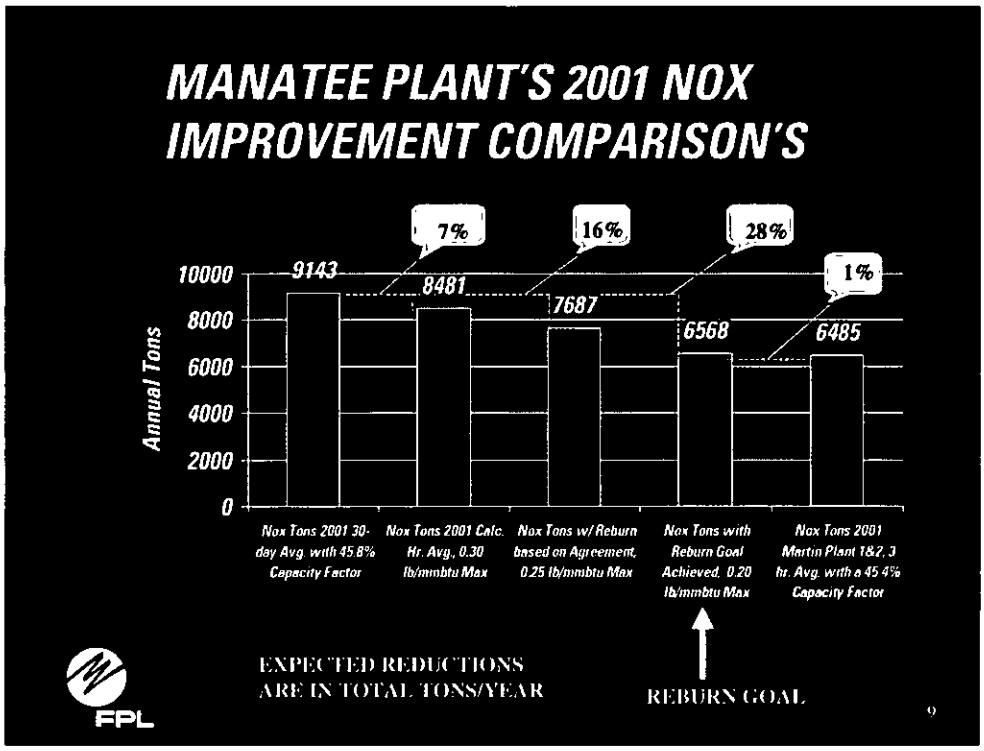
Addressing the concerns that were raised about the 30 day rolling average.

The Quarterly CEM data is available for PUBLIC REVIEW in the AIR MARKETS section on the EPA web site -

ADDITIONALLY - Prior years HOURLY INFORMATION can be viewed and downloaded from the EPA web site. SO THE DATA IS AVAILABLE TODAY.

BACKUP DATA:

HTTP://WWW.EPA.GOV/AIRMARKETS/EMISSIONS/PRELIMARP/03Q2/032.FL.TXT



This slide addresses the Martin vs. Manatee NOx output comparison.

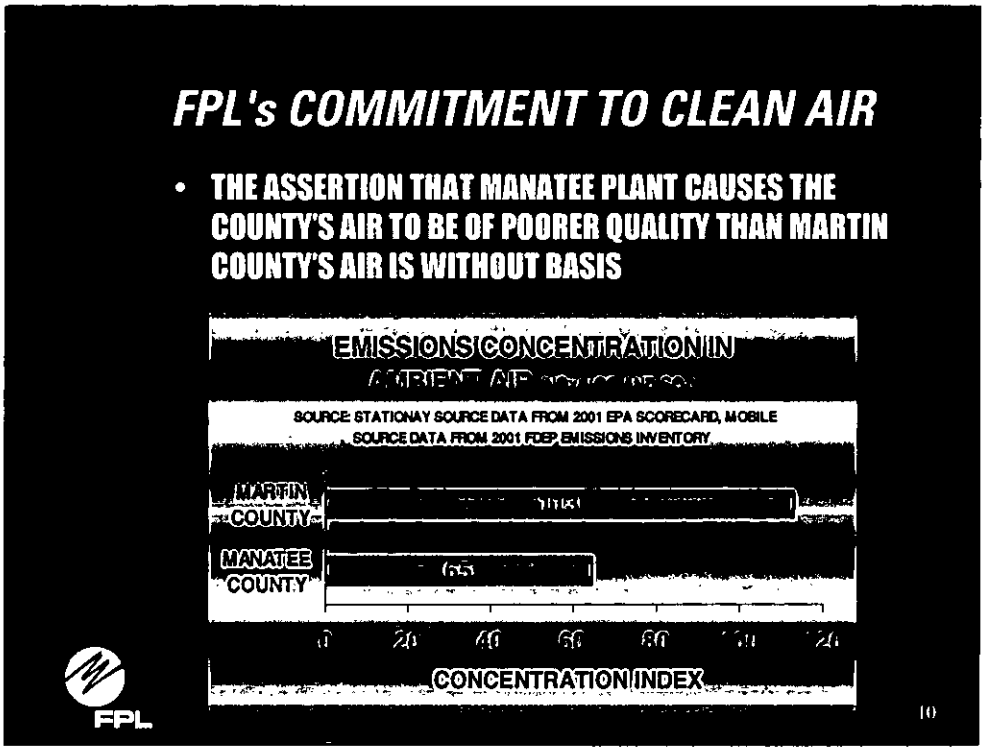
First Bar: 2001 total NOx tons with a 45.8% capacity factor. The 2001 actual scorecard data.

Second Bar: What the 2001 total NOx tons would have been if NO HOURLY AVERAGE was permitted to be above .3 lb/mmbtu.

Third Bar: What the total NOx tons would be if we meet the CURRENT REBURN AGREEMENT. A 16% reduction in TOTAL TONS.

Fourth Bar: What the total NOx tons would be if we meet the REBURN GOAL mentioned in the current agreement. A 28% reduction in Total Tons.

The last Bar: is Martin Plant from 2001 with a slightly lower capacity factor than Manatee and their 3 hr. hourly Avg. SO OUR EXPECTATION IS THAT MANATEE OPERATES ON PAR LIKE MARTIN WITH THE USE OF REBURN TECHNOLOGY.



• Some have suggested that Manatee County's air is poorer than Martin County's air DUE TO THE DIFFERENCE IN ANNUAL EMISSIONS between the Manatee and Martin Plants.

• Comparisons on a county vs. county basis are NOT particularly meaningful due to the REGIONAL NATURE of air emissions. However, if one does make the comparison, it's clear to see that the concentration of emissions in Manatee County's ambient air is significantly less than Martin County. Even if one were to normalize the counties to equal areas, Manatee County still would have a lower Concentration Inde than Martin County vs.

•The emissions in this graphic are NO ,VOCs, and SO_2 from FPL plants, and mobile sources in each county.

The emissions from the US Generating Plant in Martin county are not included in the comparison.....If it were, that would increase Martin's ambient air concentration even further.

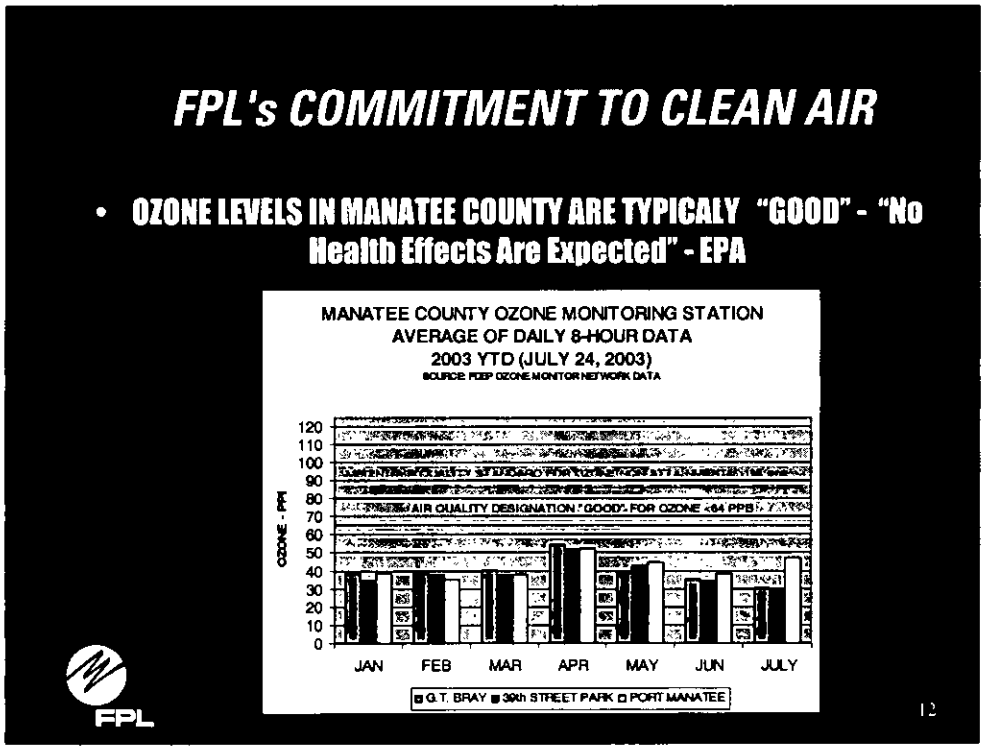
NOTE - The concentration Inde is annual tons of emissions per cubic mile of ambient air

Manatee Plant's contribution of NOx and VOCs to the Tampa Bay region is about 4% of the total

Vehicle emissions are the largest sources. Other mobile sources, i.e. aircraft and diesel locomotives are not included in this data, nor are refueling operations.

Other electric generating sources, i.e. co-gen. sources and aste to energy sources in the Tampa Bay area are not included in this data, nor are other small industrial /commercial sources (dry cleaners, medical aste incinerators, printing shops, fiberglass fabrication, etc.).

Including the other sources ould make the Manatee Plant's contribution even less.



- As this graph represents -Manatee County has good air quality
- The average ozone levels at all of Manatee County's ambient air monitoring stations are good.
- "Good" in terms of the EPA's Air Quality Index (AQI) means less than 64 ppb and "No health effects are expected" - EPA
- The ozone levels are ell belo the threshold for non-attainment (85 ppb)
- Ozone levels are most influenced by mobile sources and climatic conditions. Fluctuations in the levels are driven mostly by climatic conditions.
- Any citizen can access the County Monitoring data on the FDEP's Florida Ozone Net ork Website and vie the data:

.dep.state.fl.us/air/ozonenet.htm

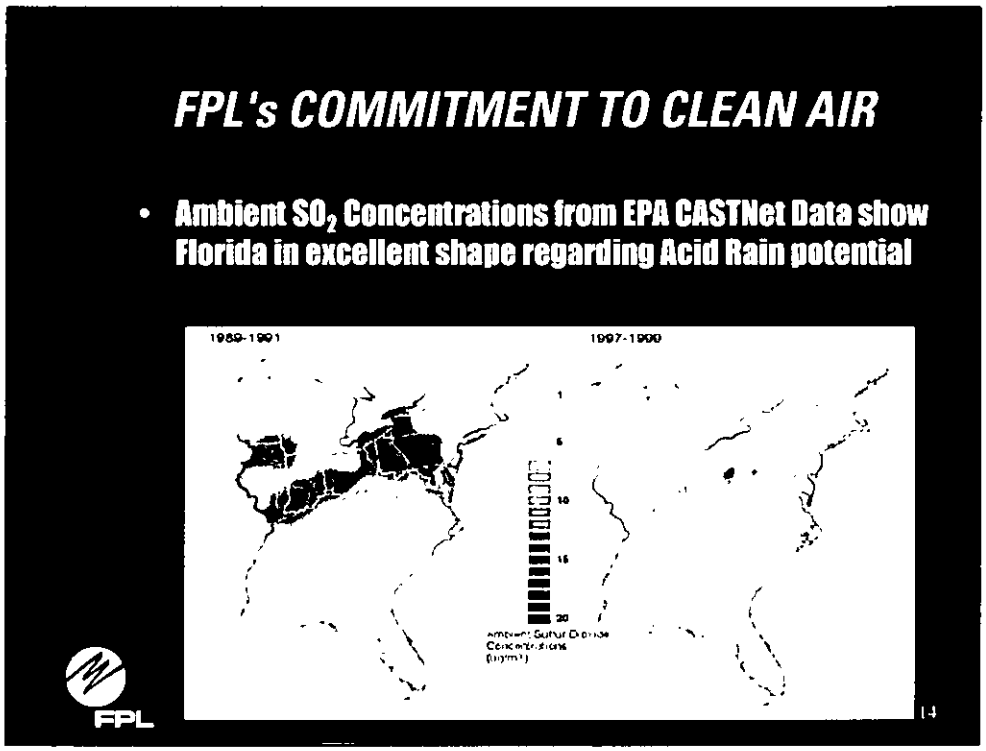
The AQI on any given day is available from the Manatee County Environmental Management Department's Air Quality Division.

The Current AQI Information is available on the Internet from the EPA ebsite.

BACK UP DATA:

EMD advertised phone number - 749-0079

EPA WEB SITE: http:// .epa.gov/airno / here/



·This is a comparison of SO2 concentrations from the period of 1989-1991 and 1997-1999

·Florida's ambient air has the lo est levels of sulfur dioxide in the eastern U.S.

·There is no Acid Rain problem in Florida due to SO_2 emissions from utility sources, or any other sources.

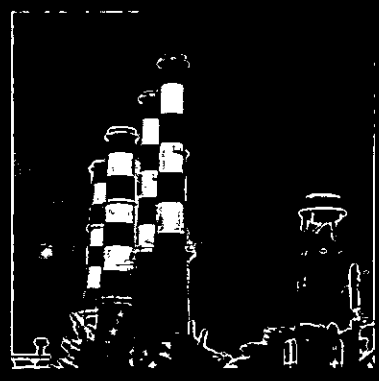
·Else here in the Eastern U.S. ambient air SO_2 concentrations are improving.

·This data also confirms that the science behind EPA s health based standards and the res ltin emissions limits in the Clear Air Act are ell fo nded and or in .

• What the data tells us is that Manatee County's 2001 average ambient air SO_2 level as 3 ppb (Annual average standard = 20 ppb)

FPL's COMMITMENT TO CLEAN AIR

- "....To put this in perspective, your statewide SO_2 emissions for all FPL facilities combined are now less than the SO_2 emissions from the single largest emitting individual facilities in the state during the middle to late 1990's...."



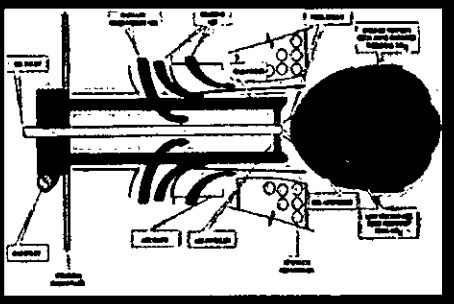
FPL

FDEP DIVISION OF AIR RESOURCE MANAGEMENT - APRIL 2003

16

FPL's COMMITMENT TO CLEAN AIR

- FPL VOLUNTARILY UPGRADED MANTATEE PLANT'S BURNERS WITH STATE OF THE ART LOW NO_x BURNERS IN 2000 & 2001



FPL

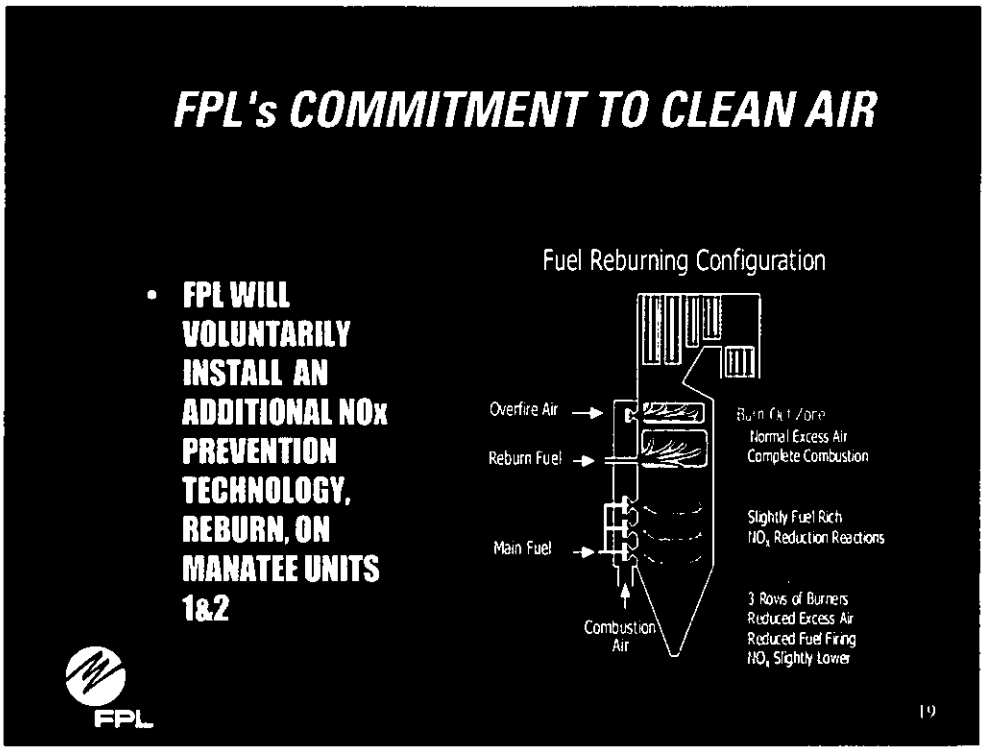
17

Adding natural gas as a fuel option as a $3.5 million dollar capital investment for Manatee Plant.

We no longer use light oil to start up our units e use natural gas.

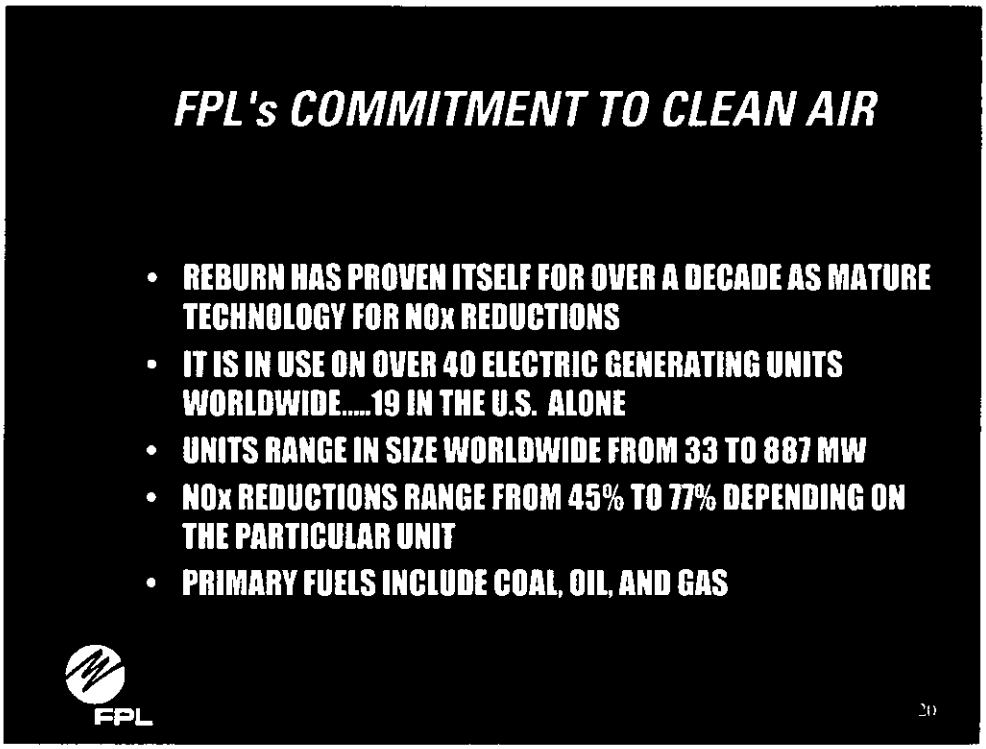
We are committed to use gas henever gas is available and cost effective.

And e *understand that* every million cu ft of gas burned displaces about 150 barrels of fuel oil.



FPL heard the concerns from Manatee County and others regarding the NOx and VOCs in the region, and voluntarily took action to help ensure that the Tampa Bay airshed would remain in compliance for ozone.

Although Manatee Plant's NOx and VOC contribution to the region is only about 4%, FPL is making a 32 million dollar investment to reduce emissions.



Reburn has proven itself for over a decade as a mature technology for NOx reductions.

It is in use on over 40 electric generating units orld ide.....19 in the U.S. Alone

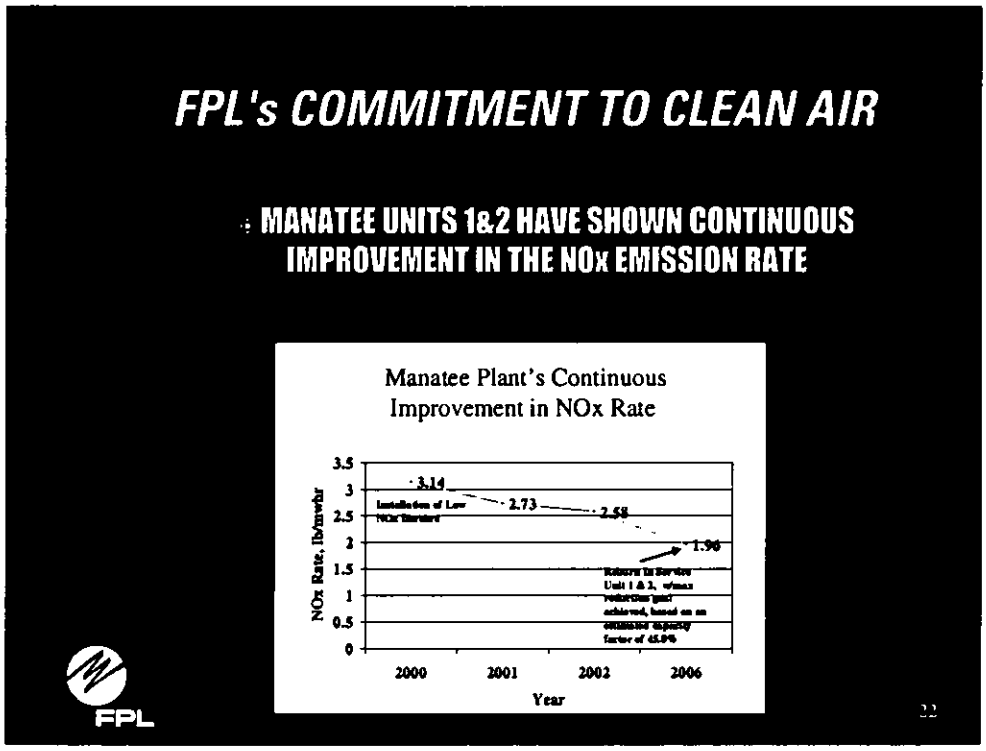
Units range in size and fuel orld ide from 33 to 887 m

NOx reductions range from 45% to 77% depending on the particular unit

Primary fuels in use include coal, oil, and gas

It has been said that Reburn is an "Experimental Technology that hasn't been proven on an 800 MW oil gas unit", hile it hasn't been proven on a MANATEE LIKE UNIT, The same argument can be made for SCR. Additionally, the same argument could have been made for any of the units sho n here until Reburn as installed and used.

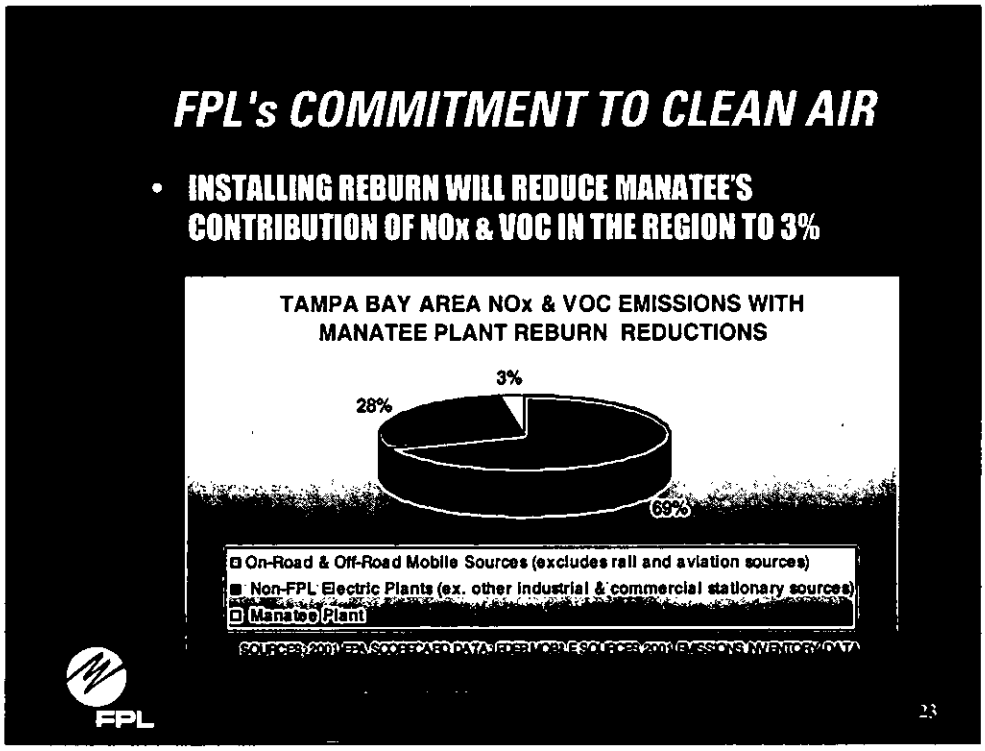
The results clearly sho that Reburn is a mature, effective means of NOx prevention.



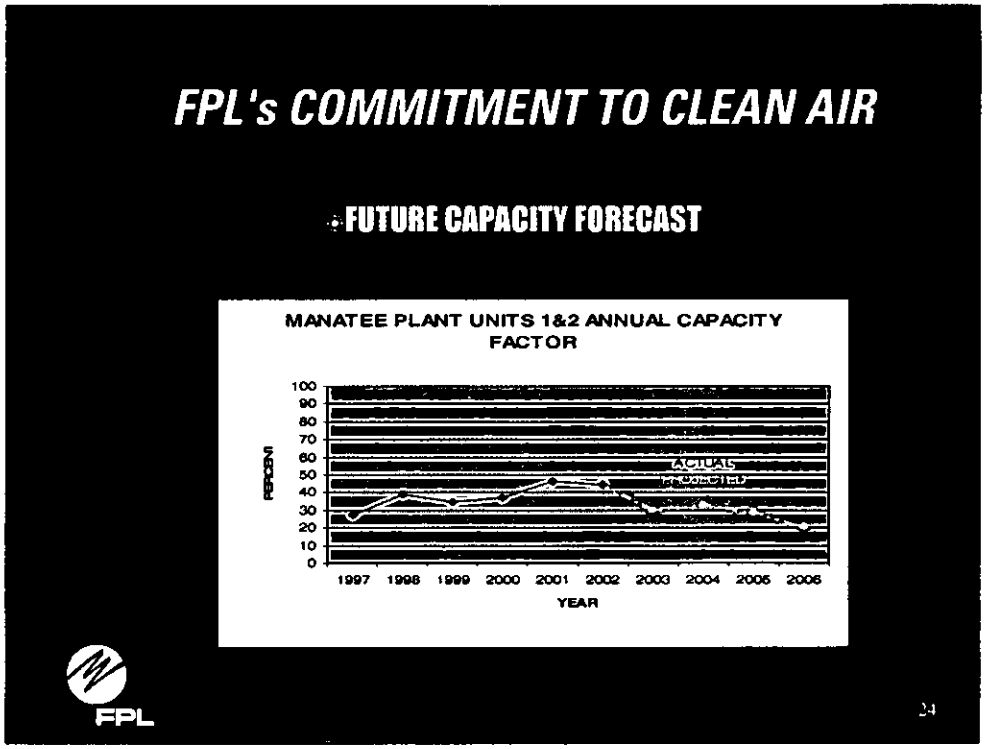
• MANATEE PLANT has continuously improved our NOx emission rate. This chart sho s the NOx rate in lbs/MWhr. We have been able to make incremental improvements since e installed our Lo NOx Burners.

No - The project goal for Reburn is to achieve a NOx emission rate on EITHER fuel, hich is equivalent to the Ne Source Performance Standards for natural gas (0.2 #/mmbtu). Culminating in a reduced NOx Rate to 1.96 lbs/MWhr.

·We ill continue ith our commitment to ork hard to discover opportunities that lo er our emissions.



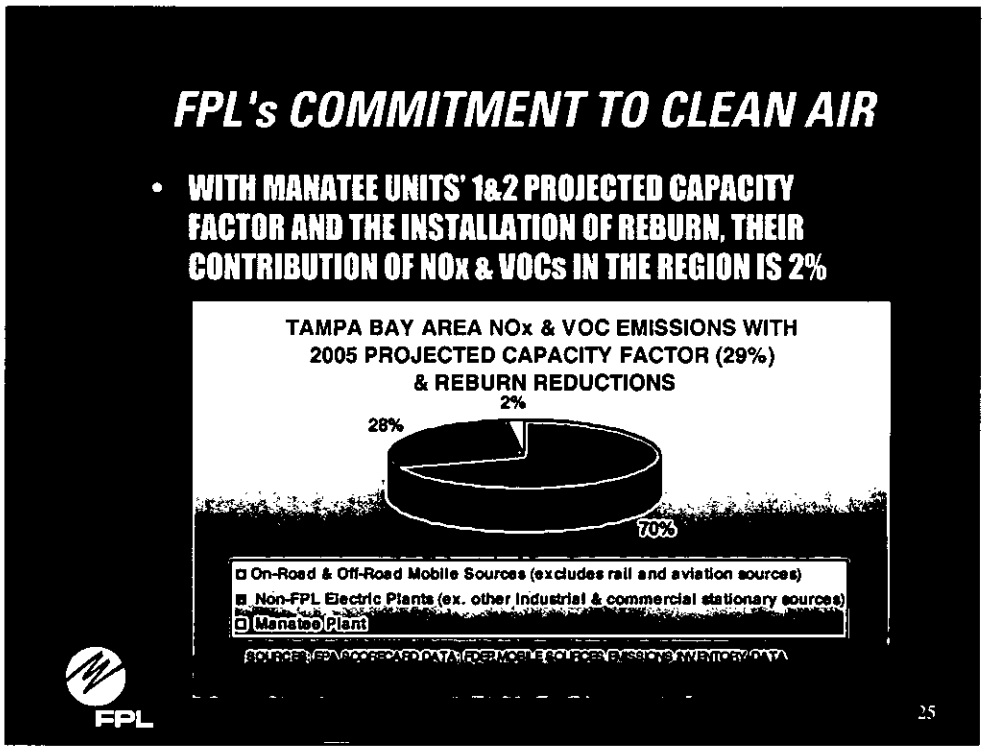
Installing Reburn will reduce Manatee's contribution of NOx and OC in the region to about 3 .



Manatee Units 1 2 are projected to run less often in the future, lessening their already small contribution to emissions in the region.

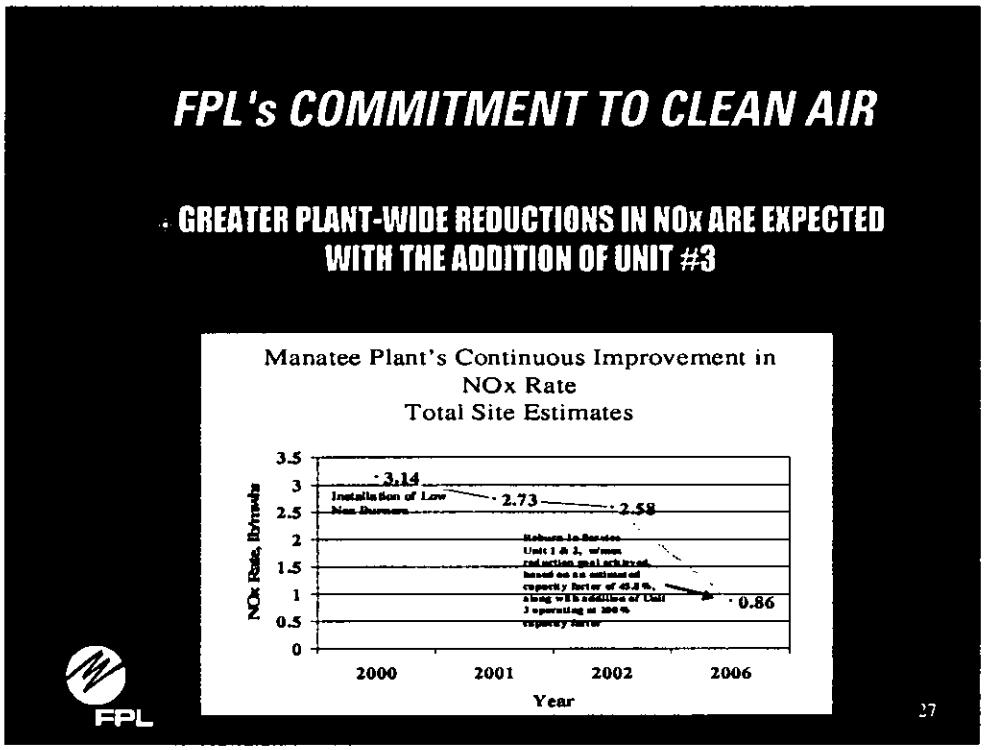
They ill continue to be dispatched as intermediate, load-follo ing units.

This is another confirmation that Reburn is the best choice as a NOx PREVENTION TECHNOLOGY for Manatee 1 2. Because SCR NOx removal technology is CLEARLY BETTER SUITED FOR BASE-LOADED UNITS.

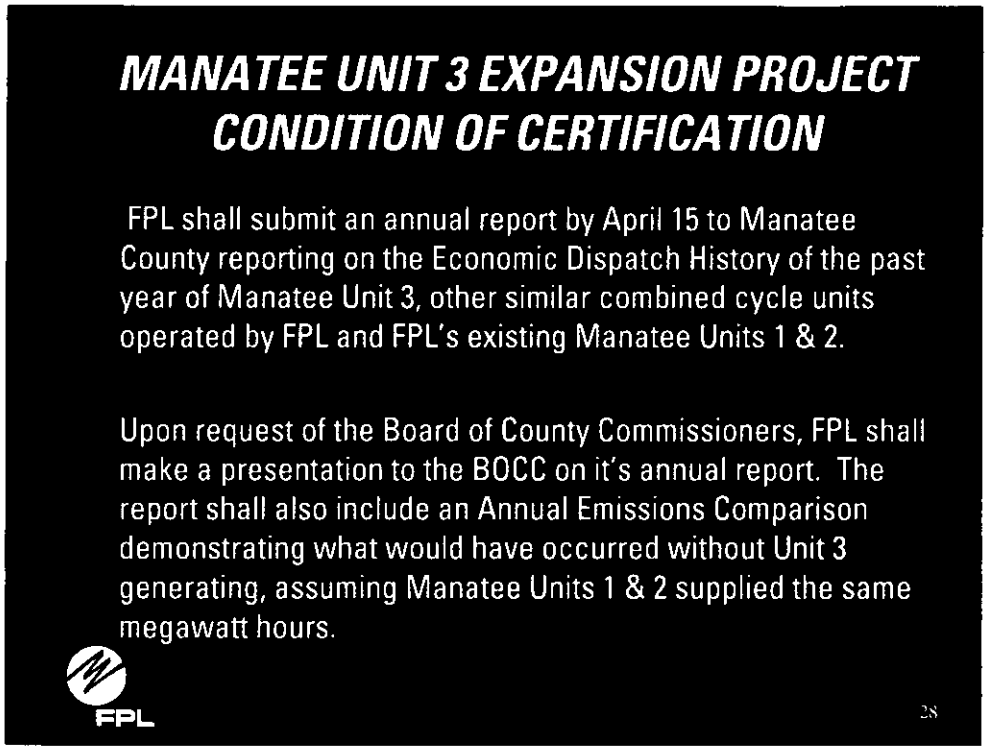


With the projected reduction in capacity factor for Units 1 2 (29% in 2005), and the installation of Reburn, Manatee's contribution to the region's NOx VOCs ill be about 2%.

We are expanding to meet the regions increasing need for po er by adding 1100 MW's of combined cycle, unit 3, using the Best Available Control Technology.



With the addition of unit 3 and meeting our REBURN goal the total site emissions ill improve to .86 lbs/MWhr



At the recent county commission meeting the dispatch order of units 1, 2, and 3 came into question.

During the permitting process of unit 3, the county and Florida Po er and Light created the stipulation sho n here. That stipulation as adopted in the final order as a condition of certification.

It simply says that e ill submit a report to the county on the Economic Dispatch History AND at your request e ill make a presentation on the annual report.