March 24, 2003

FPL Manatee Power Plant

Electric generating units, #1 and #2 at Florida Power and Light's (FPL) Manatee plant in 2001 and 2002 were, by far, the dirtiest (worst) emissions of nitrogen oxides (NOx) and sulfur dioxide (SO_2) in the entire FPL system. These data were obtained from FPL's Annual Operating Report (AOL).

FPL witnesses testified during the Orimulsion hearings that the two generating units at their Martin plant and the two FPL units at the Manatee plant are "alike." Not only that, but at an informational meeting conducted in Palmetto on October 25, 1994 by FPL, Mr. Lamar Parrish, a citrus grove owner in Parrish and a former member of the Manatee County Board of County Commissioners, raised the issue of citrus burn. Jerry Kirk, FPL General Manager of the Orimulsion project said;

> *"We've been aware of that for some time and have participated with the county in trying to determine some of the root causes of that problem.*
>
> *"It is a bit of a phenomenon to us because we have another plant, and I'll give you an example. Our Martin plant, which is just about on the same latitude as the Manatee plant as far as north-south goes, and it is completely surrounded by orange groves, huge orange groves in the Martin County area and 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 a problem."*

That is deliberately misleading the public. Subsequently we learned that the Martin plant was and is restricted to an NOx emission rate of 0.3# per million BTUs (0.3#/mm BTU's) on an hourly basis while the Manatee plant is on a 30-day rolling average. This has resulted, at times, of NOx emissions of 0.6#/mm BTUs. Supposedly, this has happened before new burners were installed in the year 2000. It is reported that at present NOx emissions are between 0.3 and 0.4 #/mm BTUs.

1. It is requested that access to gross loads and emission rates of the Manatee #1 and #2 units on the FPL web site daily and on an hourly basis. It can be done!
2. FPL states that NOx emissions can be reduced as much as 40% by adding reburn equipment. On January 24, 2002, Alan Bedwell, Deputy Secretary of the Florida Department of Environmental Protection (FDEP) stated that he has not seen that anywhere else in the country. Also, a reduction of 65% has been mentioned. Let's see the back-up data or are we becoming guinea pigs again. Remember the '90s when FPL and the FDEP tried to give us Orimulsion.

COPING magazine is in its 6th year. It is environmental / medical in nature. In their March / April 2003 issue an article on The Growing Environmental Threat includes a discussion of asthma. It is stated:

> *"**Sulfur Dioxide:** Substantial scientific evidence has linked specific air illness and decreased pulmonary function, especially in children. People prone to allergy, especially those with allergic asthma, can be extremely sensitive to inhaled sulfur dioxide, for example. Symptoms may include brochospasm, hives, gastrointestinal disorders and inflammation of the blood vessels (vasculitis-related disorder)."*

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and

> *"**Ozone and Nitrogen Dioxide:** Temporary or perhaps permanent bronchial hypersensitivity has been connected to inhaled ozone and nitrogen dioxide. Long-term exposure to nitrogen dioxide has been associated with the increased occurrence of respiratory illness.*
>
> *Significant exposure to airborne pollution occurs inside homes, offices and nonindustrial buildings. These settings have not received nearly the attention by pollution control agencies that they deserve."*

On April 4, 2003 we received FPL's Preliminary Emissions Estimates for FPL 2002/2001. (see attachment). It is reported that the entire FPL system emissions of SO_2 is 94,542 tons/year in 2002. Manatee units #1 and #2 emitted 31,198 tons in the same year. That is 33% of the total!

Another point, in 2001, the Manatee units' NOx output was 10,340 tons/year and produced 6,696,527 megawatt hours. The comparable figures for 2002 are 9,838 and 6,403,218 respectively. This results in rates of 3.09 # of NOx per megawatt hour in 2001 and 3.07# of NOx per megawatt hour in 2002. Not much of a difference.

On February 27, 2003 an editorial in the Manatee Herald-Tribune was entitled, Don't Compromise On Air Quality. The last paragraph stated:

> *"Before they consider signing off on the Parrish plan, Bush and the Cabinet need to take a fresh look at the available options – and ensure that our region's air quality isn't compromised further."*

We agree. Both FPL and the FDEP don't seem to get the message - WE WANT CLEAN AIR!

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Preliminary Emissions Estimates for FPL 2002/2001

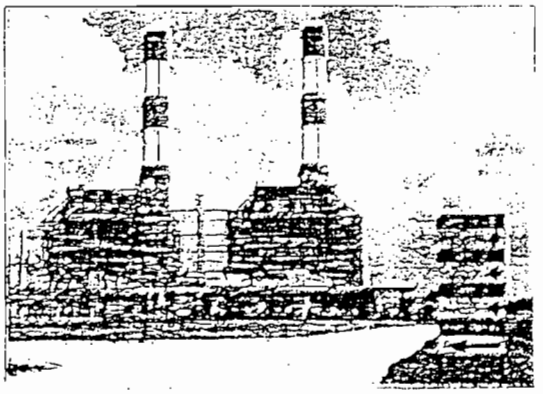
(Subject to Change Following Quality Assurance Review. Source FPL AOR Submittals)

Site Name	EU Description	2002 NOx (tpy)	2002 SO2(tpy)	2001 NOx (tpy)	2001 SO2(tpy)
CAPE CANAVERAL POWER PLANT	FOSSIL FUEL STEAM GENERATOR,UNIT #1	2463	4983	2927	6265
CAPE CANAVERAL POWER PLANT	FOSSIL FUEL STEAM GENERATOR, UNIT #2	2413	4738	2915	6677
CAPE CANAVERAL POWER PLANT	Internal Combustion Engines	0	0	1	0
CAPE CANAVERAL POWER PLANT	Emergency Diesel Generators	0	0	0	0
	Total Cape Canaveral Power Plant	4876 (4)	9721 (4)	5744	12942
PORT CANAVERAL OIL STORAGE FACILITY	F.P.&L. OIL HEATING BOILER 400HP, VE	0	0	0	0
PORT EVERGLADES POWER PLANT	FOSSIL FUEL STEAM GENERATOR, UNIT 1 (Acid Rain, Pl	1031	3013	1110	3313
PORT EVERGLADES POWER PLANT	FOSSIL FUEL STEAM GENERATOR, UNIT 2 (Acid Rain, Pl	1092	3195	1335	3878
PORT EVERGLADES POWER PLANT	FOSSIL FUEL STEAM GENERATOR, UNIT 3 (Acid Rain, Pl	2464	6116	2714	7002
PORT EVERGLADES POWER PLANT	FOSSIL FUEL STEAM GENERATOR, UNIT 4 (Acid Rain, Pl	2425	5785	2957	7556
PORT EVERGLADES POWER PLANT	12 SIMPLE CYCLE GAS TURBINES, GT1 THROUGH GT12	345	24	263	30
PORT EVERGLADES POWER PLANT	Misc. internal combustion engines, portable equipment	1	0	1	0
	Total Everglades Power Plant	7358 (2)	18133 (2)	8380	21779
FORT LAUDERDALE POWER PLANT	Bank of 12 Combustion Turbines (Nos. 1 to 12)	456	21	290	9
FORT LAUDERDALE POWER PLANT	Bank of 12 Combustion Turbines (No. 13 to 24)	491	27	225	9
FORT LAUDERDALE POWER PLANT	CCCT with HRSG (CT 4A) (Phase II Acid Rain Unit)	786	18	751	19
FORT LAUDERDALE POWER PLANT	CCCT with HRSG (CT 4B) (Phase II Acid Rain Unit)	785	18	758	19
FORT LAUDERDALE POWER PLANT	CCCT with HRSG (CT 5A) (Phase II Acid Rain Unit)	796	18	748	21
FORT LAUDERDALE POWER PLANT	CCCT with HRSG (CT 5B) (Phase II Acid Rain Unit)	772	17	774	21
FORT LAUDERDALE POWER PLANT	Emergency Diesel Generator	3		4	
	Total Fort Lauderdale Power Plant	4089 (7)	119 (9)	3549	98
CUTLER POWER PLANT	Fossil Fuel Fired Steam Generator#5- Phase II Acid Rain Ur	173	0	133	0
CUTLER POWER PLANT	Fossil fuel Fired Steam Generator#6- Phase II Acid Rain Uni	373	1	314	1
	Total Cutler Power Plant	546 (11)	1 (11)	447	1
TURKEY POINT POWER PLANT	440 MW Boiler- Phase II, Acid Rain Unit (Fossil Plant)	2324	4307	2455	4719
TURKEY POINT POWER PLANT	440 MW Boiler- Phase II, Acid Rain Unit (Fossil Plant)	2232	4288	2323	4894
TURKEY POINT POWER PLANT	(5) 2.75 MW Diesel Generators (Fossil Plant)	1	0	14	0
TURKEY POINT POWER PLANT	(4) 2.5 MW emergency diesel generators (Nuclear Plant)	2	0	15	0
TURKEY POINT POWER PLANT	(5) Other Diesel Emergency Generators (Nuclear Plant)	1	0	1	0
TURKEY POINT POWER PLANT	Miscellaneous Diesel Plant Equipment (Nuclear Plant)	3	0	1	0
	Total Turkey Point Power Plant	4563 (5)	8595 (6)	4809	9613
FORT MYERS POWER PLANT	Fossil Fuel Fired Steam Generator #1 (Dismantled)	0	0	408	2479
FORT MYERS POWER PLANT	Fossil Fuel Fired Steam Generator #2 (Dismantled)	0	0	2378	14455
FORT MYERS POWER PLANT	Combustion Turbine #1	421	213	424	215
FORT MYERS POWER PLANT	Miscellaneous mobile equip & internal combustion engines,	0	0	3	0
FORT MYERS POWER PLANT	Emergency diesel generator	0	0	4	0
FORT MYERS POWER PLANT	250MW Combined Cycle Combustion Turbine (2A)	134	2	263	1
FORT MYERS POWER PLANT	250MW Combined Cycle Combustion Turbine (2B)	125	2	202	1
FORT MYERS POWER PLANT	250MW Combined Cycle Combustion Turbine (2C)	110	2	258	1
FORT MYERS POWER PLANT	250MW Combined Cycle Combustion Turbine (2D)	122	2	213	1
FORT MYERS POWER PLANT	250MW Combined Cycle Combustion Turbine (2E)	127	2	227	1
FORT MYERS POWER PLANT	250MW Combined Cycle Combustion Turbine (2F)	114	2	173	1
	Total Fort Myers Power Plant	1153 (10)	226 (8)	4551	17154
BOCA GRANDE FUEL OIL TERMINAL	PACKAGE BOILER,350 HP, CLEAVER-BROOKS	3	10	3	10

( ) Represents ranking on FPL system.

		2002 NOx (tpy)	2002 SO2(tpy)	2001 NOx (tpy)	2001 SO2(tpy)
	Total Boca Grande Fuel Oil Terminal	3	10	3	10
MANATEE POWER PLANT	Fossil Fuel Steam Generator, Unit 1-Phase II Acid Rain Unit	4629	14690	5459	17685
MANATEE POWER PLANT	Fossil Fuel Steam Generator, Unit 2-Phase II Acid Rain Unit	5209	16508	4881	15812
MANATEE POWER PLANT	Emer. diesel generator, misc. mobile equipment & IC engine	0	0	0	0
	Total Manatee Power Plant	9838 (1)	31198 (1)	10340	33497
PORT MANATEE OIL STORAGE FACILITY	FUEL OIL HEATER "A1254" 15 MMBTU/HR MAXIMUM	2	6	1	2
PORT MANATEE OIL STORAGE FACILITY	FUEL OIL HEATER "B1254", 15 MM BTU/HR MAX.	0	0	0	0
	Total Port Manatee Oil Storage	2	6	1	2
MARTIN POWER PLANT	Fossil Fuel Fired Steam Generator #1(Acid Rain, Phase II)	2434	6404	3229	8555
MARTIN POWER PLANT	Fossil Fuel Fired Steam Generator #2(Acid Rain, Phase II)	2937	8215	3154	8608
MARTIN POWER PLANT	Combustion Turbine with HRSG (CT 3A)(Acid Rain, Phase II	318	4	262	4
MARTIN POWER PLANT	Combustion Turbine with HRSG (CT 3B)(Acid Rain, Phase II	331	4	329	4
MARTIN POWER PLANT	Combustion Turbine with HRSG (CT 4A)(Acid Rain, Phase II	247	4	265	4
MARTIN POWER PLANT	Combustion Turbine with HRSG (CT 4B)(Acid Rain, Phase II	178	4	239	4
MARTIN POWER PLANT	Auxiliary Boiler	0	0	0	0
MARTIN POWER PLANT	Diesel Generator(0.716 MW for Units 003-006)	1	0	1	0
MARTIN POWER PLANT	Simple Cycle Gas Turbine Unit 8A	98	6	197	1
MARTIN POWER PLANT	Simple Cycle Gas Turbine Unit 8B	81	5	184	1
MARTIN POWER PLANT	Diesel Generator for EUs 001 and 002	1	0	1	0
	Total Martin Plant	6636 (3)	14648 (5)	7861	17183
RIVIERA POWER PLANT	Fossil Fuel Steam Generator, Unit 3 -Phase II Acid Rain Uni	1903	4731	2396	10844
RIVIERA POWER PLANT	Fossil Fuel Steam Generator, Unit 4 -Phase II Acid Rain Uni	1866	4001	2286	10467
RIVIERA POWER PLANT	Emergency diesel generator, and mobile equip. & engines	0	0	0	0
	Total Riviera Power Plant	3769 (8)	8732 (5)	4682	21411
PHYSICAL DISTRIBUTION CENTER & OSF	12.5 mmBTU/hr boiler #1 (Unit A) burning No.6 fuel oil	0	1	1	4
PHYSICAL DISTRIBUTION CENTER & OSF	12.5 mmBTU/hr boiler #2 (Unit B) burning No.6 fuel oil	0	1	1	2
	Total Physical Distribution Center & OSF	1	2	2	6
PUTNAM POWER PLANT	CT for Combined Cycle HRSG11, Phase II Acid Rain Unit	1052	7	893	14
PUTNAM POWER PLANT	CT for Combined Cycle HRSG12, Phase II Acid Rain Unit	1052	7	893	14
PUTNAM POWER PLANT	CT for Combined Cycle HRSG21, Phase II Acid Rain Unit	991	11	827	41
PUTNAM POWER PLANT	CT for Combined Cycle HRSG22, Phase II Acid Rain Unit	991	10	827	41
PUTNAM POWER PLANT	Ductburners for CC HRSG11, Phase II Acid Rain Unit	71	0	62	0
PUTNAM POWER PLANT	Ductburners for CC HRSG12, Phase II Acid Rain Unit	60	0	58	0
PUTNAM POWER PLANT	Ductburners for CC HRSG21, Phase II Acid Rain Unit	68	0	55	0
PUTNAM POWER PLANT	Ductburners for CC HRSG22, Phase II Acid Rain Unit	58	0	56	0
PUTNAM POWER PLANT	Auxiliary Boiler	18	0	17	0
PUTNAM POWER PLANT	Emergency Diesel Generator, Mis Mobile Equp. & Int.Com.E	4	0	4	0
	Total Putnam Power Plant	4365 (a)	36 (a)	3691	111
FPL / ST LUCIE NUCLEAR PLANT	4 MAIN PLANT EMERGENCY DIESEL GENERATORS	3	0	17	2
FPL / ST LUCIE NUCLEAR PLANT	2 BUILDING EMERGENCY DIESEL GENERATORS	0	0	0	0
FPL / ST LUCIE NUCLEAR PLANT	MISCELLANEOUS DIESEL DRIVEN EQUIPMENT	0	0	5	0
	Total FPL/St Lucie Nuclear Power Plant	3 (12)	0 (12)	22	2

		2002 NOx (tpy)	2002 SO2(tpy)	2001 NOx (tpy)	2001 SO2(tpy)
SANFORD POWER PLANT	Fossil Fuel Steam Generator Unit 3 (Phase II Acid Rain Unit	809	1937	793	3639
SANFORD POWER PLANT	Fossil Fuel Steam Generator Unit 4 (Phase II Acid Rain Unit	1415	1170	2238	8903
SANFORD POWER PLANT	Fossil Fuel Steam Generator Unit 5 (Ceased Operation)	0	0	2076	9284
SANFORD POWER PLANT	Emergency generators, fuel oil storage tanks, mis.activity	10	1	10	1
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#9)	100	2		
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#10)	101	2		
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#11)	88	2		
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#12)	115	2		
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#13)				
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#14)				
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#15)				
SANFORD POWER PLANT	250 MW Combined Cycle Combustion Turbine (EU#16)				
	Total Sanford Power Plant	2438 (9)	3116 (7)	5117	21828
SYSTEM TOTAL		49641	94542	59198	155638
Manatee percent of total		19.8%	33.0%	17.5%	21.5%



The Florida Power & Light
Power Plant – Parrish, Florida

THE MANATEE PROBLEM

Prepared by
Clarence G. Troxell
January 26, 2003

The Manatee Problem

Florida Power and Light (FPL), it's Manatee power plant and the Florida Department of Environmental Protection (FDEP) have been enigmas to the citizens of Manatee for years. Number one and number two units at the Manatee plant are absolutely the dirtiest in the FPL system, both in emission of nitrogen oxides (NOx) and sulfur dioxide (SO_2) which have adverse effects on the environment and health.

Comparison of FPL's Martin and Riviera plants with the Manatee plant

Just five days ago a lengthy article appeared in the Palm Beach Post about an FPL's Riviera Beach power plant. The article makes several points including this one:

> **"Numbers from the state Department of Environmental Protection show that while FPL's Riviera Beach plant is in compliance with its permit, it is still not using as much clean fuel as at facilities like the company's Martin County plant. The Martin plant, for example, is four times bigger yet produces less sulfur-dioxide than the Riviera plant."**

Manatee County Citizens Against Pollution (MCAP) and others have shown concern about the Manatee power plant. For instance, FPL conducted an informational meeting on Orimulsion at Kendrick Auditorium in Palmetto, on 10-25-94. Lamar Parrish, a citrus grove owner in Parrish and a former member of the Manatee County Board of County Commissioners, raised the issue of citrus burn. Jerry Kirk, General Manager of the Orimulsion project said:

> **"We've been aware of that for some time and have participated with the county in trying to determine some of the root causes of that problem.**
>
> **"It is a bit of a phenomenon to us because we have another plant, and I'll give you an example. Our Martin plant, which is just about on the same latitude as the Manatee plant as far as north-south goes, and it is completely surrounded by orange groves, huge orange groves in the Martin County area and 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 a problem."**

FPL witnesses testified several times during the Orimulsion hearings that the two generating units at Martin and the two units at Manatee are "alike". Let's compare the operating results for the year 2001:

	Emissions (tons per year)*			
	NOx	Rank	SO_2	Rank
Manatee #1 & #2	10,340	1	33,497	1
Martin #1 & #2	6,383	3	17,166	5
Riviera	4,882	6	21,411	4

*From FPL Annual Operating Report (AOR)

What's the reason? Well, Martin has been burning a combination of gas and oil. Martin may not exceed a pollution limit of 0.3 lbs./million BTUs on an hourly basis but Manatee regulations permit NOx emissions to exceed a 0.3 lbs./min BTUs because they are on a 30-day rolling average. The Manatee and Martin units may be alike but they're permitted to operate differently. You mean that Jerry Kirk didn't know that? Deceitful!

Cost Savings

FPL started out the Orimulsion confab by stating that the typical customer using 1000-Kilowatt hours (kwhr) would save $3.50 per month. As far as total savings are concerned, FPL started out with savings of $6 billion over 20 years and later reduced that figure to $4 billion. During the hearing FPL went below $4 billion. MCAP did its own economic study and concluded that the savings to that 1000 KWHR customer would be a penny-a-day. WOW! What a difference. Then, on September 4, 1997, the Tampa Tribune wrote an article entitled, "FPL Backs Off Vow of Lower Bills With Orimulsion." The article included the following:

> "We are not guaranteeing a savings, because no one can do that under the Public Service Commission's regulations," FPL attorney Peter Cunningham told staffers who are preparing for next week's Cabinet meeting on the issue.

Why didn't FPL and Cunningham say that in the beginning? They never acknowledged the MCAP report but they really did by taking the actions that they did later. Again, that's deceitful! Yes, there're other points raised in that Tampa Tribune article that deserve answers.

Nitrogen Oxides (NOx) and Sulfur Dioxide (SO_2)

There's an organization in Washington, D.C. called "The Institute of Clean Air Companies" (ICAC). There are approximately fifty (50) ICAC members including well-recognized names as: Englehard, Corning, Siemens, 3M, Babcox and Wilcox, and Entropy.

In the beginning ICAC states their purpose as follows:

"Federal and state regulations require control of NOx emissions both to minimize the direct effects of these emissions on human health and the environment, and to minimize the formation of acid rain and ground level ozone, to which NOx is a major contributor. Regulators and regulated industry seek controls which will be both reliable and effective, but without unreasonable cost to industry and society. One proven and cost-effective NOx control technology is selective catalytic reduction (SCR). Unfortunately, misconceptions regarding SCR have hindered its acceptance and in some cases even its consideration.

"The SCR Committee of the Institute of Clean Air Companies, Inc. (ICAC) prepared this white paper to educate all interested parties on the capabilities, limitations, and cost of SCR.

"ICAC is the non-profit national association of companies which supply stationary source air pollution control systems, equipment, and services. Its members include suppliers of SCR systems, as well as of alternative NOx control technologies."

FPL is most familiar with Entropy. Entropy performed the Orimulsion tests for FPL at the FPL Sanford plant.

There are well over 500 sources who have used SCRs. Southern California Edison has installed 14 SCRs on 14 of their generating units (gas) with a capacity totaling 5830 mega-watts. Also in California: Pacific Gas & Electric and San Diego Gas & Electric. In Florida, there are Orlando Utilities and U.S. Generating in Indiantown. AND, FPL is using SCRs in its new #3 unit at its Manatee plant required by a regulation called, New Source Review (NSR).

At a meeting of FPL officials with the Manatee County Board of Commissioners, Chairlady Amy Stein asked FPL if the #1 and #2 units at Manatee are grandfathered? FPL responded that they are not. This was not the first time that FPL stated that publicly. That being the case, why aren't SCRs being installed?

A FPL letter sent to area residents dated January 2003 states that the project will provide enough power to serve an additional 235,000 customers. This new unit has a capacity of 1100 megawatts. Number one and Number two units have a capacity of 1600 megawatts. This much power is not staying here. So where is it going? It could go to other parts of the FPL system or to other utilities, but the crap stays here.

A staff writer for the Palm Beach Post wrote a lengthy article about FPL's Riviera plant which appeared on Sunday, January 19, 2003. The article includes the following:

> **"FPL meeting letter of the law**
>
> **"But environmentalists say they have been asking FPL to commit to improving its Riviera Beach, Port Everglades and Cape Canaveral plants for several years. And while FPL has taken some steps, they chide the utility for not improving enough so those nearby residents can breathe the same air as someone living next to a newer plant.**
>
> **"It's wonderful they have reduced it a little bit, but why can't they comply with the standards met by newer power plants every day?" said Tom Sadler, Florida representative for the National Environmental Trust, a Washington advocacy group. "Sure they are meeting the letter of the law, but they are not meeting the spirit of the law. The bottom line is these plants are old and outdated. They can afford to do it and they should be doing it."**

Now, look at the above figures (page three) comparing the Riviera and Manatee plants. The Palm Beach area thinks that FPL is bad. They should have our situation!

From ICAC, November 1997:

> **"Perceived high cost has been an impediment to the adoption of SCR in the U.S. While this perception has been based largely on incorrect information, both the capital and operating costs of SCR have dropped significantly over the past decade because of technological innovation, increased manufacturing experience, and competition among manufacturers. Much longer expected catalyst lives have contributed to the reduced operating cost.**
>
> **"Decreased costs, successful operating experience, and tightened permit limits have let to a sharp increase in the number of SCR systems installed in the U.S. Given a large and growing installed base and the increasing tendency of owners and operators of regulated units to choose SCR, authorities with extensive NOx control experience have concluded that SCR technology is proven, safe, reliable, and economical"**

SO_2 has not received the attention that it should. Again ICAC in a white paper dated May 1995 states:

> **"Flue gas desulfurization (FGD) systems or "scrubbers" are highly efficient and reliable for the removal of sulfur dioxide (SO_2) – the leading precursor of acid rain – as well as particulate matter, hydrochloric acid and other air toxins. Scrubbers, which have been used for 25 years, are not only commercially proven, but are the standard by which new technology is judged. This standard is continually rising as scrubber cost-effectiveness, reliability, waste recycling, and efficiency have improved through application of the latest technological advances. Intense vendor competition, customer demands, regulatory imperatives, and competing control options have provided a great impetus to raise this standard.**
>
> **"Sulfur dioxide, one of the priority pollutants targeted by the Clean Air Act, is the prime contributor to acid deposition (acid rain). In addition to damaging crops, buildings, and the environment, sulfur dioxide and acid rain together cause a wide range of adverse health effects, which according to highly regarded scientific studies claim as many lives each year as automobile accidents. While emissions of SO_2) have dropped over the past twenty years, levels of this pollutant in some areas of the U.S. still exceed the National Ambient Air Quality Standard set by the Environmental Protection Agency. Worldwide, nations are enacting laws to dramatically reduce SO_2 emissions, and the off-shore market for FGD systems is robust."**

It can't be stated any better!

FPL Investments

FPL has a subsidiary called, "FPL Energy, LCC. From a 2001 Group Profile, FPL states:

> **"FPL Energy, LCC is a leader in developing, constructing and operating clean-energy, independent power projects. In December 2001, FPL Energy had 1,054 employees.**
>
> **"The subsidiary grew its portfolio by nearly 25 percent in 2001 to more than 5000 net-megawatts in operation, and FPL Energy has announced projects that will almost double its generating capacity by the end of 2004. FPL Energy now operates or has ownership in more than 70 power plants in 14 states. There are seven plants under construction, three of which are expected to be in operation during the summer of 2002."**

But, FPL can't install SCRs? Yes, and scrubbers too! Why not? At the February, 2002 meeting of the Parrish Civic Association, the representative of FPL stated that control equipment does "not earn money." Is this a reason?

The following appeared in the Sarasota Herald Tribune on April 10, 2001:

> **"Although merger talks fail, execs pocket hefty bonuses**
>
> **"FPL Group's failed merger with New Orleans *Entergy* Corp. was a bust for the Florida utility's shareholders, but FPL's top executives exited the deal like lottery players who just hit the jackpot.**
>
> **"In an unusual move even in this day of multimillion-dollar executive salaries and bonuses, FPL chairman and chief executive James Broadhead and his seven top lieutenants will keep $60 million in merger-related bonuses paid to them in cash in December."**

And, no SCR's at the generating station. That smells (stinks)!

In Conclusion

1. **The FDEP and elected officials are obligated to look out for the interests of the public not only for the interests of FPL. As Waldo Proffitt stated in an editorial for the Manatee Herald Tribune, on January 19, 2003; "I point out that the preamble to the Constitution names one of the purposes of government as 'to promote the general welfare'."**

   And, then, in his visit to Florida in February, President George W. Bush stated that corporate America must be more "fair and open." I agree! We're tired of corporate abuse.

2. **The Manatee Herald Tribune, on May 22, 2002, printed a guest column by Paul Plotkin, manager of FPL's power plant in Parrish and on August 9, 2002, a guest column by Allan F. Bedwell, deputy secretary for regulatory programs at the FDEP. Both articles are highly propaganda. Where are the facts?**

3. **FPL intends to use "reburn" in units #1 and #2. Where has it been done elsewhere? Why can't FPL have a utility representative from outside of the State of Florida who has had this experience? I've done it. While working in Newark, NJ for Public Service and Gas Co., I testified for an electric utility in Massachusetts.**

4. **We request access to gross loads on all Manatee units, and emission rates on the FPL web site daily and on an hourly basis. It can be done!**

5. **We want clean air! It is our right to have!**

6. **During a siting procedure, it is our understanding that the "public good" can be taken into account in rendering a decision, not just the legal aspects.**

7. **This is a case of WEALTH VS. HEALTH. It is suggested that you, the public, write to:**

Governor Jeb Bush
The Capitol
Tallahassee, FL 32399-0001
Phone: 1-850-458-4441
E-mail: jeb@jeb.org

Letting the Governor and office holders know how you feel is most important.

SPEAK UP
SPEAK OUT
SPEAK

Clarence G. Troxell

Clarence G. Troxell
3321 Lakeside Circle
Parrish, FL 34219
Phone: (941) 776-2047
E-mail: Elihu46fl@aol.com

Author's Credentials

B. of Engg. – Yale University
M.S. – Stevens Institute of Technology
Worked for Public Service E & G (New Jersey) for 40 years
Member of Manatee County Republican Executive Committee
Co-founder of Manatee County Citizen's Against Pollution (MCAP)
Past-President – Federation of Manatee County Associations.

MANATEE
Herald-Tribune

DIANE H. MCFARLIN, Publisher
JANET S. WEAVER, Executive Editor THOMAS LEE TRYON, Editorial Page Editor
DIANE P. TENNANT, Managing Editor WILLIAM H. HANSEN, Manatee Publisher

EDITORIALS

Don't compromise on air quality

Governor, Cabinet should keep options open on FPL plans

Florida Power & Light is drawing closer to receiving the final OK to expand its power plant in northern Manatee County. But that approval shouldn't be viewed as a foregone conclusion.

Last week, a state hearing officer recommended that Gov. Jeb Bush and the Cabinet approve plans for a new natural-gas-fired unit at FPL's Parrish plant.

Natural gas burns more cleanly than oil or coal. But critics of FPL's plans are still concerned — with good reason — that the plant's oil-fired units will continue to degrade the region's air quality if power production increases in the years ahead.

Initially, FPL officials resisted requests by Manatee Citizens Against Pollution and other groups to retrofit the 27-year-old oil burners with new anti-pollution equipment. When the public pressure didn't subside, the utility agreed to install "reburn" technology to curb harmful emissions.

FPL's change of heart was certainly welcome, but critics are still pushing for the utility to install more-advanced equipment, called "selective catalytic reduction," on the existing burners.

FPL officials say the costs of the SCR equipment would outstrip the benefits. Their concerns have merit; the state and FPL do have an obligation to utility customers to find the most cost-effective means to limit pollution. But neither entity, we hasten to add, should pinch pennies at the expense of public health.

Before they consider signing off on the Parrish plan, Bush and the Cabinet need to take a fresh look at the available options — and ensure that our region's air quality isn't compromised further.

4/10/03

MANATEE
Herald-Tribune

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EDITORIALS

FPL-under scrutiny

Cabinet-level concern about Parrish plant's emissions is warranted

The region's air quality is likely to benefit from Florida Power & Light's plans to add a natural-gas unit to its power plant in northern Manatee County. But, as two of the state's top officials indicated this week, FPL may need to do more to reduce the plant's pollution.

As expected, Gov. Jeb Bush and the Cabinet gave final approval Tuesday to FPL's plans to begin burning natural gas at its Parrish plant. Clean-air advocates have long lobbied for a switch to natural gas because it burns more cleanly than oil or coal.

But the plant isn't converting completely to natural gas, as some initially had hoped. FPL officials say they intend to continue burning oil at the existing two units.

Manatee Citizens Against Pollution and other groups are concerned, with good reason, that the older units will continue to degrade the region's air quality if power production increases in the years ahead.

At Tuesday's meeting, two Cabinet members — Chief Financial Officer Tom Gallagher and Attorney General Charlie Crist — asked about the possibility of a full conversion.

Department of Environmental Protection Secretary David Struhs said he and FPL officials believe it's better to have two fuel choices available because of supply and cost concerns. He added, however, that his agency would take a closer look at stricter pollution controls when operating permits for the existing units are up for renewal later this year. Gallagher and Crist said they want to receive periodic updates on those efforts.

Neither Gallagher nor Crist is known as an environmentalist, but their interest in the Parrish plant is welcome — and warranted. According to FPL figures, the yearly volume of smog-producing nitrogen oxide and sulfur dioxide at the Parrish plant is higher than at any other FPL facility.

Earlier this year, FPL agreed to install "reburn" technology on the existing burners at the Parrish plant to reduce emissions. But critics are still pushing for more advanced pollution-control equipment.

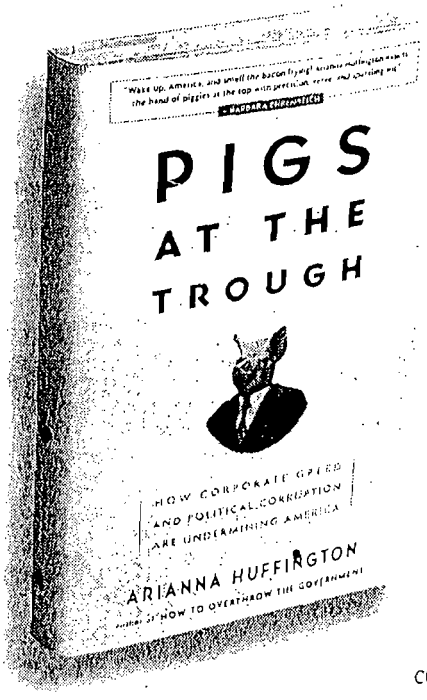
The utility certainly has an obligation to its customers to find the most cost-effective means to limit pollution, but — as we've said throughout this process — neither FPL nor the state should pinch pennies at the expense of public health.

In the months ahead, DEP officials need to re-examine the performance of the existing burners at Parrish. As Gallagher and Crist indicated this week, adding one natural-gas unit may be only part of the upgrade needed at the Parrish plant.

'Pigs at the Trough' takes corporate greed to task

Pigs at the Trough: How Corporate Greed and Political Corruption are Undermining America
By Arianna Huffington
Crown, 275 pages, $22

By Linda M. Castellitto
Special for USA TODAY



As I read *Pigs at the Trough*, Arianna Huffington's latest work of wit and outrage, some other part of my brain piped up and noted it's a good thing people usually sit while they read.

After getting an eyeful of the shameful goings-on of the New Economy of the 1990s and early 2000s, anyone standing would surely find themselves swooning in a combination of overwhelming incredulity and anger.

Sure, if you've been paying even a bit of attention to the headlines, you'll know — at the least — about Enron and Arthur Andersen and the pop of the gigantic Internet bubble.

Let's start with CEO extravagances. In a section called "Upstairs/Downstairs," Huffington writes about what's happening with the higher echelon vs. the worker bees. One example: Kmart's former CEO Charles Conaway got nearly $23 million in compensation during his two-year tenure, but the 22,000 Kmart workers who lost their jobs last year received no severance pay.

At Enron, she writes, senior employees were treated well financially, but others "were fired at mass meetings or, even more heartlessly, with a message left on their voice mail."

Huffington is a syndicated columnist who knows the value of entertaining her readers. Referring to the practice of executives giving themselves loans from their companies, she says, "It's like Tony Soprano getting his loan 'approved' by Paulie Walnuts."

Then for page after page of *Pigs at the Trough*, Huffington writes about the collusion between corporations and the government. It's downright disturbing.

That's what Huffington wants to do, of course: show Americans what their leaders and corporate titans are up to, so that we pay attention, get angry and speak up — because the people we've elected to do that for us aren't necessarily going to. Why? Well, Huffington says, they're being dogged by lobbyists and treated to corporate campaign donations.

Huffington gives Harvey Pitt (the former SEC chairman, whom the author says was less competent at being a watchdog than a cartoon character) a thorough dressing-down, saying he failed to pursue and censure the corporate misconduct that occurred during his tenure.

She points at companies that obtain a Bermuda business address to avoid U.S. taxes — and then get government contracts. She writes how pharmaceutical, accounting, tobacco, power, meat and farming companies are all guilty of conspiring with the government to defraud, oh, almost everyone.

Money bookshelf

Through it all, of course, the CEOs — the "pigs" — get raises despite declines in company earnings, and elected officials accept corporate campaign donations and fail to enforce laws that businesses are breaking. No one accepts responsibility, no one apologizes, no one is held accountable for their actions.

Huffington acknowledges these high-level machinations may seem remote to many Americans, the dollar values of the companies' colossal losses hard to fathom, so she is careful to repeatedly show just why we should be worried about what's happening to our country. If you or I, she asks, were to mismanage a company, give and/or take bribes, cause thousands of people to lose their jobs and their savings and take personal loans from the company coffers, what would happen if we were caught? Would the average American, say, be sent to jail forever? Or would we, like many CEOs, receive a raise, a jet and tickets to Belize?

Isn't it maddening? The final 25 pages of the book offer suggestions for corporate reform and a list of Web sites for groups that address the various issues explored in *Pigs at the Trough* — which leans more toward detailing and decrying wrongdoing than problem solving.

Part of America's problem, Huffington notes, has been our country's worship of business titans and politicians, an admiration that created an atmosphere receptive to the arrogant, unfeeling men who've been running amok in their business suits for the past decade. "After all, we thought they were working hard for their money," she writes.

It turns out, we've been enablers.

Rather than marveling at prowess and success, we should look more closely at how they amassed their riches and do what we can to make sure the pattern of corruption doesn't continue — something to ponder over a nice plate of bacon.

THE SARASOTA HERALD-TRIBUNE

Date: Tuesday, April 10, 2001
Edition: All
Section: BUSINESS
Page: D1
Source: STAFF AND WIRE REPORTS

Although merger talks fail, execs pocket hefty bonuses

FPL Group's failed merger with New Orleans' ***Entergy*** Corp. was a bust for the ***Florida*** utility's shareholders, but FPL's top executives exited the deal like lottery players who just hit the jackpot.

In an unusual move even in this day of multimillion-dollar executive salaries and bonuses, FPL chairman and chief executive James Broadhead and his seven top lieutenants will keep $60 million in merger-related bonuses paid to them in cash in December after shareholders approved the deal.

At least one state agency that was looking into the bonuses paid by the Juno Beach company seems satisfied that the payouts won't affect electric rates.

Roger Howe, an attorney in the public counsel's office, said as far as his responsibilities go, the matter is now the concern of shareholders.

The public counsel represents ***Florida*** residents in all sorts of regulated and unregulated industries, including the energy business.

"It does not appear that the bonuses will affect ratepayers, either now or in the future," Howe said.

When the bonuses were made public, both the public counsel and the ***Florida*** Public Service Commission decided to investigate the payouts to determine whether they were going to have an impact on what FPL charges customers.

Florida Power & Light is the primary utility provider in Southwest ***Florida***, serving 400,000 customers in Manatee, Sarasota and Charlotte counties.

Broadhead's take alone from the failed merger was $21.1 million, which came on top of his normal salary of $974,000, along with $1.1 million in performance bonuses and $13.5 million in accrued retirement benefits.

Broadhead's total pay package in 2000 was $36.7 million for running the parent company of ***Florida Power & Light***.

PSC staff attorney Bob Elias said that whether or not Broadhead and company should keep the bonuses because of the merger failure is entirely a shareholder issue, and not the PSC's responsibility.

But unlike the public counsel, he said the PSC is still investigating whether the size of the bonuses may affect rates.

The merger-related bonuses were part of a pre-existing, long-term incentive program for FPL executives that potentially would have been paid to them over a period of years as cash bonuses and extra stock options based in part on the company's financial performance.

The better the company's performance, the bigger the bonuses.

"Change of control" clauses in the executives' contracts, which are common in American corporations, triggered the early payments as an incentive for the executives to stay with FPL after the merger even though their future with the new combined utility might be uncertain.

What made the FPL payments highly unusual was that the lump sums were paid well in advance of the deal's completion, which was expected in late 2001. Most comparable "change of control" payments at other companies, including ***Entergy***, are triggered by the closing of an acquisition.

"I certainly can't recall the last time I saw something like this," said Gregory Phelps, a John Hancock Patriot Funds manager whose firm owns about 100,000 shares of FPL preferred stock. He said the bonuses, and the refusal by FPL executives to return the money, blemished the otherwise good reputation enjoyed by the management team among investors.

Broadhead defended the payments during a conference call last week with utility stock analysts and institutional investors. He said he has no intention of giving back the windfall.

Merrill Lynch Investment Managers fund manager Bill Paster told Broadhead during the call that the money should be returned.

"It's the right thing to do, Jim," said Paster, whose firm owns 907,445 shares of FPL stock.

"Well, that's your opinion I guess," Broadhead retorted.

Entergy executives did not receive any bonuses for the merger attempt, but ***Entergy*** president Don Hintz and ***Entergy*** Nuclear Operations chief executive Jerry Yelverton were in line for $5.52 million in retention incentives that

would have been paid in installments at the close of the deal and on the first three anniversaries.

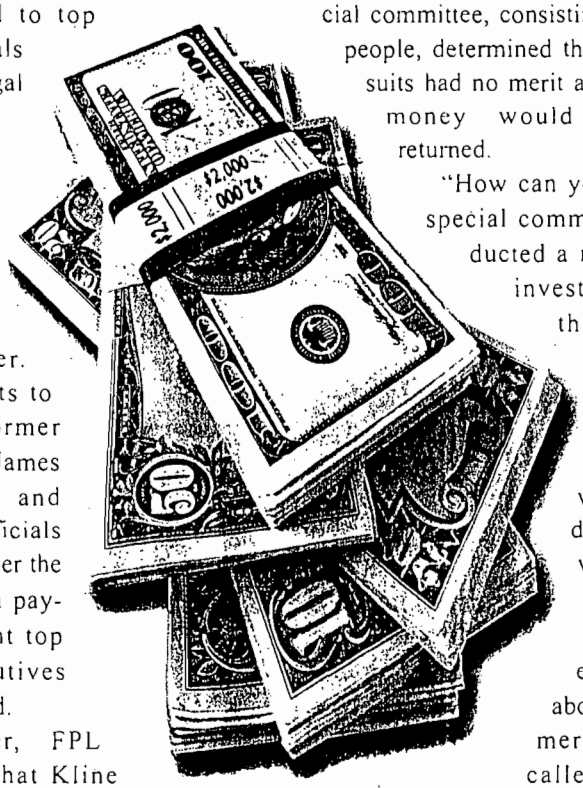
Entergy chief executive Wayne Leonard would not have received any bonuses or retention payments, although he stood to double his annual $836,538 salary after becoming chief executive officer of the combined utility.

FPL's shares, which trade on the New York Stock Exchange, were selling for $60 at the close of regular trading on Monday, up $1.20, or about 2 percent.

Staff writer Jason Hall contributed to this report, which also contains information from The Associated Press.

FPL's $62 Million Bonuses for Eight Executives in Court Again

The failed merger between Florida Power & Light (FPL) and Entergy Corp. that resulted in controversial bonuses being distributed to top FPL officials is under legal fire from William Kline, a New York-based FPL shareholder. Kline wants to talk to former FPL chief James Broadhead and Entergy officials about whether the $62-million payout to eight top FPL executives was justified.



However, FPL contends that Kline and his attorney have no right to question Broadhead or Entergy based on previous legal agreements that prohibit interviewing anyone at FPL or Entergy. In addition, FPL contends that the payouts were triggered by shareholder approval and that the payments were part of a long-term incentive plan that shareholders approved in 1986, 1994 and 1999.

Kline's attorney, Florida-based Ken Vianale, argues that the "change of control" that was necessary for the payouts to happen never occurred since the merger failed.

Due to this current legal battle and previous lawsuits filed by FPL shareholders regarding the controversial bonuses, FPL set up a special committee to investigate whether the money should be returned. The special committee, consisting of three people, determined that the lawsuits had no merit and that the money would not be returned.

"How can you say the special committee conducted a reasonable investigation of the circumstances surrounding the payouts when they didn't interview any senior Entergy executives about why the merger was called off so suddenly," said Vianale in the *Palm Beach Post.*

In April 2001, FPL's Broadhead pulled the plug on the merger attributing it to a clash of corporate cultures and that the financial statements from Entergy given to FPL did not match those Entergy gave to its own board of directors—a claim Entergy chief Wayne Leonard vehemently refutes.

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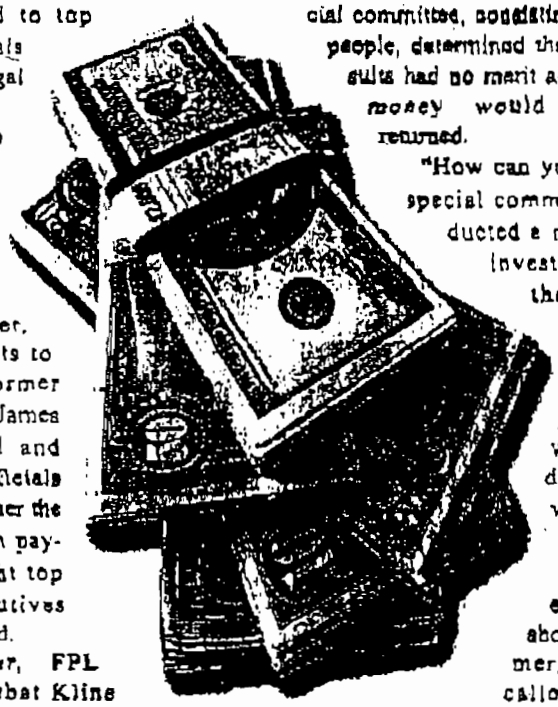

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A Florida Municipal publication

Florida Power & Light Company, 19050 State Road 62 Parrish, FL 34219-9220

FPL

July 23, 2003

RECEIVED
JUL 28 2003
BUREAU OF AIR REGULATION

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

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).

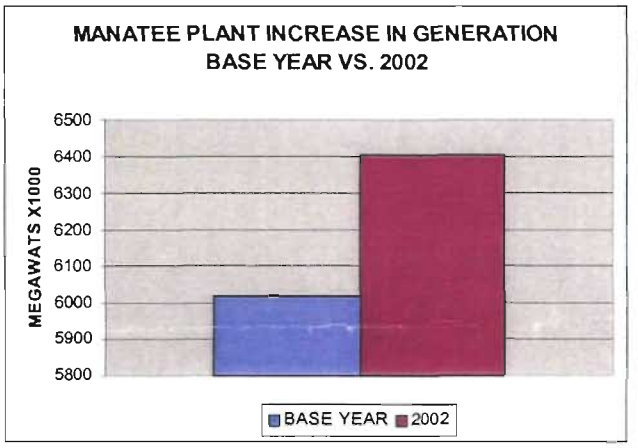

Fig. 1

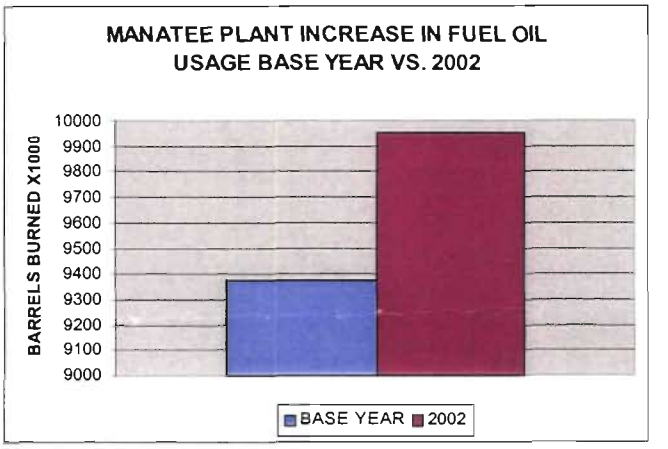

Fig. 2

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.

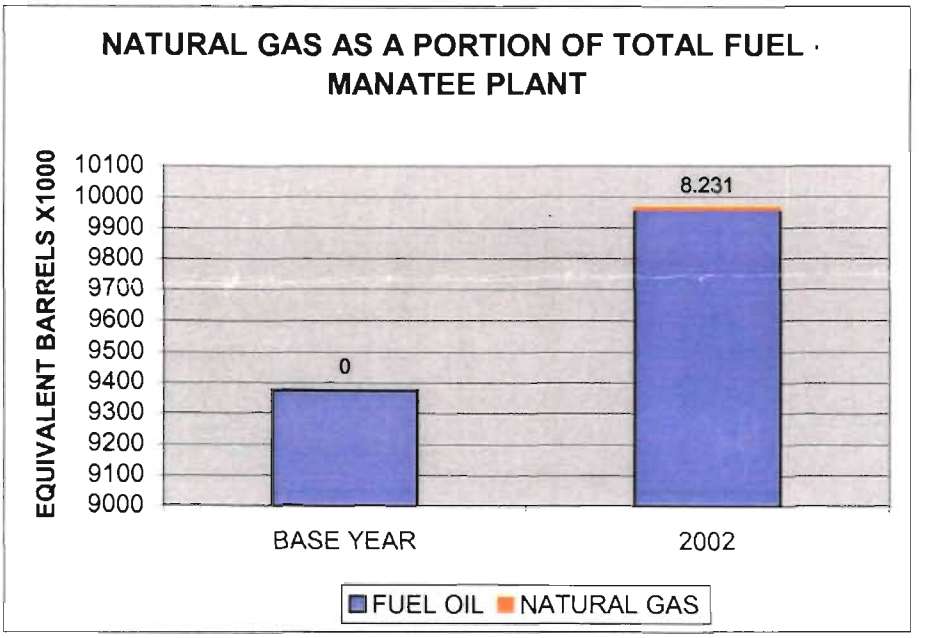

Fig. 3

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

Coalition for Clean Air

Title V Permit for Florida Power and Light's Manatee Plant

In May 2003, Florida Power and Light (FPL) prepared a Title V Permit application for its Manatee plant. The current permit expires on December 31, 2003. The Manatee plant is, by far, the dirtiest (most polluting) in the entire FPL system. This coalition requests that substantial improvements in Manatee Units #1 and #2 be made. On September 22, 2003, the coalition met and reviewed the report submitted by Manasota 88. (See Attachment)

A. Background

1. **Martin**

It has been stated by FPL that the FPL Manatee Units #1 and #2 and the FPL Martin Units #1 and #2 are "alike." However, the Martin plant has been burning a combination of natural gas and oil since 1985. In our "red" book under Fuel Costs the following appeared:

"FPL states that the Florida Public Service Commission (FPSC) requires that they burn the cheapest fuel. That means that Manatee #1 and #2 units would burn only oil for extended periods of time – a year maybe? An FPSC staff member was asked then how does FPL get to burn natural gas? The reply was, "*FPL burns the lowest cost fuel that satisfies environmental requirements.*" Wow – where does Manatee County stand?'

"If Manatee #1 and #2 were operated the same as Martin #1 and #2 for the entire year of 2002 without spending any capital, the amount of NOx emissions could have been reduced by 45% and the amount of SO_2 by 53%. It would have cost FPL's phantom 1000 kwh monthly user 18 cents a month or about one-half cent a day. An editorial (5/5/2002) states, "*There's increasing evidence that air pollution increases the risk of cancer and is harmful to elderly residents, young children, and individuals with asthma and emphysema.*" *(See addendum pages1 through 3).* Natural gas is now available at the Manatee site so what's the problem?

2. **Riviera Power Plant, Palm Beach County**

In a report dated January 26, 2003, the Manatee County Citizens Against Pollution (MCAP) stated the following:

Just five days ago a lengthy article appeared in the Palm Beach Post about FPL's Riviera Beach power plant. The article makes several points including this one:

"Numbers from the state Department of Environmental Protection show that while FPL's Riviera Beach plant is in compliance with its permit, it is still not using as much clean fuel as at facilities like the company's Martin County plant. The Martin plant, for example, is four times bigger yet produces less sulfur dioxide than the Riviera plant."

Not only that but both the Manatee Plant and the Riviera Plant are regulated to a 30-day rolling average of emissions and an opacity factor of 40%. Martin is regulated to an hourly emission of 0.3 lbs per million BTUs and an opacity factor of 20%.

On September 23, 2003 a hearing was supposed to have been held at Palm Beach County on the Riviera Plant. We should ask for the results. Note: Riviera's generating capacity is 600 megawatts (Mw) compared with Manatee units at 1600 Mw and Martin units at 1600 Mw. (See addendum pages 4 and 5).

3. **Soot Limits**

In the past, we've been concentrating on nitrogen oxides (NOx) and sulfur dioxide (SO_2) emissions. As reported in USA TODAY on September 3, 2003 and the Bradenton Herald on September 15, 2003 (See addendum pages 6 and 7), the United States Environmental Protection Agency (EPA), is also concerned that today's rules controlling the level of soot emissions are inadequate. The USA TODAY article states:

"Scientists at the Environmental Protection Agency are urging the government to consider imposing stricter limits on the level of soot in the nation's air because evidence shows that soot contributes to sickness and death at its current level."

And, "Studies show that inhaling soot, which is too tiny to see,* contributes to heart problems, lung cancer and asthma, the report says."

*** Note: Underlining added for emphasis.**

B. The V Air Operation Permit Renewal

A.5. Visible Emissions. It states, "Visible emissions shall not exceed 40 percent opacity."
A.6. Visible Emissions-Soot Blowing and Load Change. It is stated in this section that, "Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing and load change.)"

This is exorbitant! In the September 1994 issue of Power Magazine, FPL Jerry Kirk stated that soot blowing occurred about once per shift. That was at a capacity factor of 30%. Now the Manatee Plant is at a capacity factor of about 40%. Today, how many times does soot blowing occur and what is the duration?

In the FPL 2002 Annual Report, it shows a total capability of 20,938 Mw. Of this total only 4,280 Mw are permitted the 40%/60% standard. The Port Everglades Plant is excluded because this plant will go from 40% to 20% between the years 2005 and 2007. Thus, of the 4,280 Mw, 1600 Mw or 38% of these generating facilities are located at the Manatee Plant. Again, Southwest Florida is receiving the brunt of FPL's corporate abuses.

A.15. Sulfur Dioxide. It states "The permitter elected to demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emission unit does not have an operating flue gas desulfurigation (FGD) device." Why not? Do other FPL units have FGDs? Remember, in the year 2002, the sulfur dioxide (SO_2) emissions were 31,198 tons at Manatee alone. This represents 33% of the total SO_2 emissions from all FPL generating units. Burning a mixture of oil and natural gas at Manatee, as is done at Martin, certainly would be a great help.

A.37. Used Oil. The permit states, "Burning of on-specification used oil is allowed ..." Since Manatee is the worse, by far, of all FPL generating stations in their system, this excess should not be permitted. It can easily go to one of the other FPL locations.

C. Agreement For The Purpose of Ensuring Compliance With Ambient Air Quality Standards for Ozone

This agreement is attached to the Title V Air Operation Permit Renewal. It is intended to become part of the permit. It was agreed upon by Allan Bedwell, Deputy Secretary of the DEP and Randall LaBauve, Vice President of Florida Power and Light. We are not aware of any public notice or hearing.

Item 4. Page 4. "The reburn technology installed in Manatee Units 1 and 2 shall be designed to achieve a nitrogen oxide emissions goal of 0.20 pounds per million BTU heat input on a 30-day rolling average. It is anticipated that achievement of this emissions goal will be achieved by utilizing the reburn when operating the unit at greater than or equal to 350 megawatts." In other words, reburn will not be used when the load on a unit is below 350 Mw. If selective catalytic reduction (SCR) were available NOx reduction would be continuous.

The 30-day rolling average should not be allowed. During the current 5-year permit 0.6 and 0.7 lbs of NOx per million BTU with a standard of 0.3 lbs of NOx per million BTU occurred.

At a meeting of this coalition on July 24, 2002 the DEP stated that FPL was interested in using "reburn technology" to cut emissions of NOx. It was also stated that if FPL also minimizes its use of oil and burns mostly natural gas, it could reduce NOx emissions by 65%. AND, at this meeting Allan Bedwell said, "I have not seen that anywhere else in the country." This appeared in the Manatee Herald-Tribune on July 25, 2002. (See addendum pages 8 and 9). At numerous times, FPL representatives said that they will not burn natural gas if oil is cheaper. FPL and DEP need to get their act together on this one!

The 30-day rolling average, as we understand from the DEP is limited to Riviera, Turkey Point, Cutler, and Port Everglades. (See addendum page 5).

In summary, it is recommended that both FPL and DEP consider monitoring be made available on the FPL web site. It should also be examined by the Board of County Commissioners. We think this can be done by not going to the DEP.

Let us remember that government was created to protect the public. We value our health – this is a case of Wealth vs. Health. We understand that the "public good" can be taken into account in rendering a decision, not just the legal aspects.

WE WANT CLEAN AIR

Clarence G. Troxell
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Author's Credentials

B. of Engg. – Yale University
M.S. – Stevens Institute of Technology
Worked for Public Service E & G (New Jersey) for 40 years
Member of Manatee County Republican Executive Committee
Co-founder of Manatee County Citizen's Against Pollution (MCAP)
Past-President – Federation of Manatee County Associations.

ADDENDUM

To Sen. Mike Bennett

Cost of operating Manatee on same basis as Martin for year 2002 with Manatee using natural gas

Martin #1 Natural gas generated 1,410,547 MWH
" #2 " " " 1,606,924 MWH
Total 3,017,471 MWH

3,017,471,000 KWH produced by natural gas
x $0.006 - / KWH difference between oil & natural gas (see attachment)
$18,104,826 additional

From FPL 2002 Annual Report - 98,605,000,000 KWH (sales)

$18,104,826 = $0.00018 / KWH
98,605,000,000

1,000 KWH
x 0.00018
$0.18 For that "average" customer using 1000 KWH/month the increase would be $0.18 per month or approximately 1/2 ¢ per day. Worth it? You bet!

With the use of natural gas at Manatee as at Martin, there would be a reduction of 4467 tons or 45% in NOx and a reduction of 16,579 tons or 53% in SO_2; and, without spending any capital.

Clarence G Espell
9/12/03

cc Mel Klein, FPL

WORKSHOP

Florida Power & Light's No.1 and No. 2 Power Units at Manatee - A Review July 1, 2003

Background

In May 2003, FPL prepared a Title V Permit Application for its Manatee plant in Parrish, Florida. The current permit expires on December 31, 2003. This plant is, by far, the dirtiest (most polluting) in the entire FPL system. It has been stated on numerous occasions that the FPL Manatee Units #1 and #2 and the FPL Martin units #1 and #2 are "alike." The results of the operation of the two units at Martin and the two units at Manatee for the year 2002 are:

	NET CAPABILITY (MW)		NET GENERATION (MWH)
Manatee #1	788	Heavy oil	2,866,481
Manatee #2	788	Heavy oil	3,250,150
Manatee Total			**6,116,631**
Martin #1	800	Heavy oil	1,365,656
		Natural gas	1,410,547
Total #1			2,776,203
Martin #2	782	Heavy oil	1,746,214
		Natural gas	1,606,924
Total #2			3,353,138
Martin Total			**6,129,341**

Note: Data from Scheule A - 4 FPL Annual Report 2002 and the report called *Preliminary Emmisions Estimates from FPL 2002.*

How did we get to this horrendous situation? Well, in 1985 natural gas was introduced at Martin. Natural gas is a fuel that burns much cleaner then heavy oil. Below is a summary of what we experienced this past year:

Emissions For The Year 2002

	NOx (tpy)	SO_2 (tpy)
Manatee #1	4,629	14,690
Manatee #2	5,209	16,508
Manatee Total	**9,838**	**31,198**
Martin #1	2,434	6,404
Martin #2	2,937	8,215
Martin Total	**5,371**	**14,619**

That's quite a contrast between the two locations, all because of the burning of oil and natural gas at Martin and only oil at Manatee.

Should we expect a similar decrease of emissions at Manatee with the introduction of natural gas at Manatee? FPL says that after the project at Manatee is completed, the emissions of NOx at Manatee will be about the same as it is now or maybe a little less. Why? Because they expect to

Schedule A-4 Annual Report
FLORIDA POWER & LIGHT COMPANY
- January 2002 through December 2002 -

Year / Generating Unit / Fuel	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
2002												
LAUD PEAKER 13-24												
Natural Gas	0	82,391	0.0	0.0	0.0	0	1,574,254	1.037	1,632,316	6,814,798	8.2713	4.207
Total	342	100,616	1.6	94.9	67.6	19,874	0	0.000	1,999,629	9,178,668	9.1225	0.000
MANATEE 1												
Heavy Oil	788	2,866,481	41.5	93.7	53.4	10,466	4,692,876	6.393	30,001,007	105,396,063	3.6768	22.458
Natural Gas	0	0	0.0	0.0	0.0	0	0	0.000	0	0	0.0000	0.000
Total	788	2,866,481	41.5	93.7	53.4	10,466	0	0.000	30,001,007	105,396,063	3.6768	0.000
MANATEE 2												
Heavy Oil	795	3,250,105	46.5	94.0	54.9	10,372	5,272,057	6.394	33,710,653	119,561,671	3.6787	22.678
Natural Gas	0	4,868	0.0	0.0	0.0	0	52,941	1.026	54,327	293,693	6.0335	5.547
Total	795	3,254,973	46.5	94.0	54.9	10,373	0	0.000	33,764,980	119,855,364	3.6822	0.000
MARTIN 1												
Heavy Oil	800	1,365,656	39.3	78.7	56.8	10,180	2,133,019	6.406	13,664,943	48,743,788	3.5693	22.852
Natural Gas	0	1,410,547	0.0	0.0	0.0	0	14,206,916	1.038	14,751,657	59,197,982	4.1968	4.168
Total	800	2,776,203	39.3	78.7	56.8	10,236	0	0.000	28,416,600	107,941,770	3.8881	0.000
MARTIN 2												
Heavy Oil	782	1,746,214	48.8	93.3	56.2	10,301	2,736,489	6.400	17,512,709	57,361,162	3.5712	22.788
Natural Gas	0	1,606,924	0.0	0.0	0.0	0	16,385,330	1.038	16,999,421	66,730,102	4.1527	4.073
Total	782	3,353,138	48.8	93.3	56.2	10,292	0	0.000	34,512,130	124,091,264	3.7008	0.000
MARTIN 3												
Light Oil	443	0	92.7	95.8	93.3	0	0	0.000	0	0	0.0000	0.000
Natural Gas	0	3,591,729	0.0	0.0	0.0	0	25,009,117	1.038	25,960,741	105,575,408	2.9394	4.222
Total	443	3,591,729	92.7	95.8	93.3	7,228	0	0.000	25,960,741	105,575,408	2.9394	0.000
MARTIN 4												
Light Oil	444	0	85.6	90.6	91.8	0	0	0.000	0	0	0.0000	0.000
Natural Gas	0	3,325,863	0.0	0.0	0.0	0	23,405,758	1.038	24,291,654	96,340,093	2.8967	4.117
Total	444	3,325,863	85.6	90.6	91.8	7,304	0	0.000	24,291,654	96,340,093	2.8967	0.000
PORT EVERGLADES 1												
Heavy Oil	211	554,257	32.2	98.0	58.5	11,228	962,104	6.378	6,136,729	19,929,464	3.5957	20.716
Natural Gas	0	44,004	0.0	0.0	0.0	0	567,926	1.038	589,466	2,295,278	5.2161	4.042
Total	211	598,261	32.2	98.0	58.5	11,243	0	0.000	6,726,195	22,224,742	3.7149	0.000
PORT EVERGLADES 2												
Heavy Oil	211	615,689	35.8	94.2	62.7	10,699	1,020,038	6.377	6,504,422	21,126,902	3.4314	20.713
Natural Gas	0	48,374	0.0	0.0	0.0	0	583,478	1.038	605,435	2,398,742	4.9589	4.113
Total	211	664,063	35.8	94.2	62.7	10,706	0	0.000	7,109,857	23,525,644	3.5427	0.000
PORT EVERGLADES 3												
Heavy Oil	390	1,249,109	46.4	89.2	64.8	10,202	1,952,544	6.378	12,453,909	40,452,048	3.2385	20.719
Natural Gas	0	343,364	0.0	0.0	0.0	0	3,692,018	1.038	3,833,444	15,302,660	4.4567	4.145
Total	390	1,592,473	46.4	89.2	64.8	10,228	0	0.000	16,287,353	55,754,708	3.5011	0.000
PORT EVERGLADES 4												
Heavy Oil	400	1,180,022	44.6	95.7	64.0	10,208	1,846,779	6.379	11,781,348	38,298,007	3.2455	20.738

average difference in fuel cost 0.6 ¢/kwh between oil and natural gas.

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\ECR\DB\SCDB_SYS\A4PPLSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-MCF, Nuclear-MBTU

FPL Boilers that are subject to a 30-day rolling average for NOx

These are the FPL boilers, besides those at the Manatee Plant, that are subject to a 30-day rolling average for NOx:

Unit 1, 800 MW
Unit 2, 800 MW

Riviera Power Plant, Palm Beach County
-Unit 3, 300 MW
-Unit 4, 300 MW
Turkey Point Power Plant, Dade County
-Unit 1, 440 MW
-Unit 2, 440 MW
Cutler Power Plant, Dade County
-Unit 5, 75 MW
-Unit 6, 160 MW
Port Everglades Power Plant, Broward County
-Unit 1, 225 MW
-Unit 2, 225 MW
-Unit 3, 402 MW
-Unit 4, 402 MW

The only FPL boilers subject to 40 CFR 60 Subpart D are the Martin Power Plant Units 1 & 2, at 863.3 MW each.

The following FPL boilers have no NOx limits at all:

Sanford Power Plant, Volusia County
-Unit 3, 156 MW
Cape Canaveral Plant, Brevard County
-Unit 1, 400 MW
-Unit 2, 400 MW

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Subj: **FPL Boiler Opacity Limits on Visible Emissions**
Date: 9/18/03 5:20:31 PM Eastern Daylight Time
From: Cindy.Phillips@dep.state.fl.us
To: elihu46fl@aol.com
Sent from the Internet (Details)

Mr. Troxell,

Per your request, here is a list of FPL Boiler Opacity Limits on Visible Emissions. The opacity limits stated for 3 hrs/24 hrs apply to periods of sootblowing and load changes.

Manatee Plant, Manatee County
-Units 1& 2: 40%; 60% 3 hrs/24 hrs.

Riviera Power Plant, Palm Beach County
-Units 3 & 4: 40%; 60% 3 hrs/24 hrs.

Turkey Point Power Plant, Dade County
-Units 1 & 2: 40%; 60% 3 hrs/24 hrs.

Cutler Power Plant, Dade County Units
-Units 5 & 6: 20%; 40% 2min/hr; 60% 3 hrs/24 hrs.

Port Everglades Power Plant, Broward County
-Unit 1: 40%; 60% 3 hrs/24 hrs until 5/31/06;
20%; 40% 3 hrs/24 hrs after 5/31/06.
-Unit 2: 40%; 60% 3 hrs/24 hrs until 11/01/05;
20%; 40% 3 hrs/24 hrs after 11/01/05.
-Unit 3: 40%; 60% 3 hrs/24 hrs until 10/31/07;
20%; 40% 3 hrs/24 hrs after 10/31/07.
-Unit 4: 40%; 60% 3 hrs/24 hrs until 5/31/07;
20%; 40% 3 hrs/24 hrs after 5/31/07.

Martin Power Plant
-Units 1 & 2: 20%

Sanford Power Plant, Volusia County
-Unit 3: 40%; 60% 3 hrs/24 hrs.

Cape Canaveral Plant, Brevard County
-Units1 & 2: 40%; 60% 3 hrs/24 hrs.

If you have any questions concerning this information, please let me know.

Cindy Phillips
Bureau of Air Regulation

Nation

EPA urges look at lower soot limits

Studies suggest today's rules are inadequate

By Traci Watson
USA TODAY

WASHINGTON — Scientists at the Environmental Protection Agency are urging the government to consider imposing stricter limits on the level of soot in the nation's air because evidence shows that soot contributes to sickness and death at its current level.

A draft report by the scientists was posted to the agency's Web site on Friday, two days after the EPA eased air pollution rules for power plants planning upgrades.

The report points out that many of the nation's cities don't meet the current limit for yearly soot levels.

Soot consists of a mixture of liquid droplets and specks of pollution emitted by diesel-powered vehicles, power plants and factories. The scientists' recommendations focus on the tiniest soot particles, which are the most dangerous to human health.

The idea of imposing tighter limits is sure to cause controversy because it could lead to tighter regulation of power plants, mines and other industry. The last time that EPA set stricter limits, industry lawyers fought the EPA all the way to the Supreme Court.

Studies show that inhaling soot, which is too tiny to see, contributes to heart problems, lung cancer and asthma, the report says.

The draft report concludes that "the available evidence ... calls into question the adequacy" of current levels allowed by the government and that "consideration should be given to revising the current (soot) standards to provide increased public health protection."

But the report adds that science to date has not answered important questions, such as whether soot becomes more dangerous when mixed with other kinds of air pollution. Until the questions are answered, the report says, the EPA may want to consider keeping the current limits.

Current levels were set in 1997 during the Clinton administration. Industry groups fought vigorously against them. They denounced them as based on "junk science" and sued. The Supreme Court ruled unanimously in favor of the EPA in 2001, a month after President Bush entered the White House. His administration decided to retain the Clinton administration's limits.

"It's too early for us to tell" whether the report will lead to stricter standards, says Jeff Clark, director of policy for the EPA's office of air quality planning.

If the EPA proposes new limits, it would be no later than April 2005, as part of a separate court order that set a timetable to reassess soot's effects.

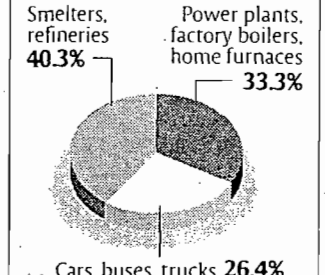
Last Wednesday, the EPA made it easier for power plants to expand without having to install new equipment to reduce air pollutants. Industry groups cheered the rule. Environmentalists denounced it.

The new report on soot limits, however, was hailed by environmentalists as a good first step toward what they hope will be tighter standards on air pollution.

"This is moving much more in the direction of what we think is appropriate and necessary," says Frank O'Donnell of the Clean Air Trust.

Scott Segal, a spokesman for companies that operate electrical generating plants, says the industry hopes all questions about the data would be discussed before any action is taken.

Where soot comes from



Source: EPA — By Quin Tian, USA TODAY

Cities with most soot

Urban areas with the highest soot levels:

Atlanta
Birmingham, Ala.
Chicago
Cincinnati
Cleveland
Detroit
Indianapolis
Knoxville, Tenn.
Los Angeles
Louisville
Pittsburgh
St. Louis

Note: Listed alphabetically. All areas exceed current soot limits. Source: EPA.

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EPA study recommends tightening soot standards

H. JOSEF HEBERT
Associated Press

WASHINGTON — New federal health standards that limit the amount of soot in the air do not adequately protect the elderly and people with respiratory problems and should be tightened, according to an internal government report.

The findings could become the basis for additional pollution-control requirements to reduce the amount of microscopic soot emitted by diesel-burning trucks, cars, factories and power plants.

Such a step would put the Bush administration at odds with business groups. They have argued the current federal soot-control standards, issued by the Clinton administration, are based on uncertain science and have cost industry tens of billions of dollars.

The new findings are in a draft paper by Environmental Protection Agency staff and are being circulated for review by outside scientists.

The 1997 standards have not yet had significant impact. They were delayed by several years of litigation as industry opponents unsuccessfully challenged the rules all the way to the Supreme Court, which eventually upheld them.

The EPA soon expects to determine what areas of the country will have to impose additional pollution-control measures because their air is so dirty it does not meet the standard.

Even as the rules are being put in place, the EPA staff review of the latest scientific studies on the effects of soot on health has concluded that the standards may not produce the intended health benefits.

The 400-page draft paper says that since 1997, some scientific studies "have confirmed and strengthened" the association between exposure to microscopic soot and premature deaths, cardiovascular problems and respiratory illnesses. Such soot contains particles and gases 20 times smaller than a strand of human hair.

Furthermore, the paper says, in many cases these studies showed adverse health effects when airborne soot concentrations were well below the maximum allowed by the 1997 standard, particularly during days when the air is especially dirty.

As a result, the staff analysis recommends the allowable concentrations be reduced further, possibly as much as 50 percent for the 24-hour standard and 20 percent for the annual average standard.

The annual average under the 1997 rule of no more than 15 micrograms of soot per cubic meter of air might have to be cut to 12 micrograms to achieve adequate health benefits, and the 24-hour standard of 65 micrograms per cubic meter to between 30 and 50 micrograms, according to the staff paper.

EPA spokeswoman Lisa Harrison said the draft paper has not been peer-reviewed by scientists and that no new soot regulations are imminent.

"EPA will not base any regulatory decision on this draft staff paper," said Harrison. "It's very early in a lengthy (review) process." She said a final draft paper, expected next year, "will include recommended options for the administrator to consider."

Health advocates cited the EPA staff finding as a major development, supporting their contention that tougher air quality standards are needed for microscopic soot because it can become easily lodged deep inside lung tissue.

FPL considers reducing emissions

The company tells the state it may retrofit its Parrish power plant to reduce pollutants.

By DALE WHITE
dale.white@heraldtribune.com

MANATEE COUNTY — Florida Power & Light is exploring an idea for retrofitting its Parrish plant to reduce smog-causing emissions – a move state officials call "good news" but some citizens greet with skepticism.

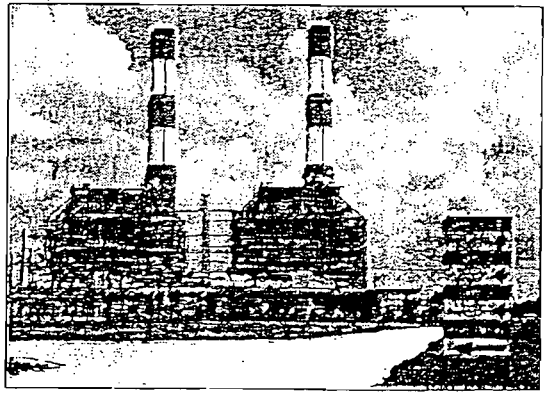
The Florida Department of Environmental Protection said Wednesday that FPL is interested in using "reburn technology" to cut emissions of nitrogen oxide. If FPL also minimizes its use of oil and burns mostly natural gas, it could reduce nitrogen oxide emissions from the 26-year-old plant by 65 percent.

"I have not seen that anywhere else in the country," DEP deputy secretary Allan Bedwell said.

During the reburn process, a secondary flame burns above the main flame in the steam-generated plant's boilers. The higher flame burns off much of the NOx emissions before they escape.

"We think it's a step in the right direction," FPL spokeswoman Kathy Scott said of the

PLEASE SEE FPL ON 2B



STAFF PHOTO / BERT CASS / bert.cass@heraldtribune.com

If FPL reduces its use of oil and burns mostly natural gas, it says it could reduce nitrogen oxide emissions at Parrish. A coalition of environmental groups say it's not enough.

Re: Meeting held on 7/24/02

Manatee Herald-Trib Thurs. July 25, '02 (Page 1B)

FPL FROM 1B

reburn proposal. "We hope it's viewed favorably."

Yet a coalition of environmental, political and neighborhood groups who met with Bedwell on Wednesday weren't satisfied.

"Nobody reacted with enthusiasm," Clarence Troxell of Manatee Citizens Against Pollution said. "We want further improvements."

Representatives from MCAP, Manasota-88, the Sierra Club, Federation of Manatee County Community Associations, Colony Cove Homeowners Association, the Democratic Party and the Republican Party talked with Bedwell about FPL's pending requests to burn natural gas at the existing plant and to build another gas-burning plant on its Parrish property.

The groups want FPL to install scrubbers and catalysts on the existing plant to further reduce emissions, of various pollutants including NOx. New power plants are required to have such technology under state law.

The existing plant in Parrish is "grandfathered in under the federal Clean Air Act," Bedwell said. State regulators can't force FPL to install the latest pollution controls on the existing plant unless there is a recurring smog problem in Manatee.

FPL can make such changes, Bedwell said, if the utility convinces the Public Service Commission that the environmental benefits are worth a rate increase, which would be needed to pay for the equipment that could cost millions.

Bedwell insisted that FPL has made several concessions to public interest groups.

"FPL has heard your concerns," Bedwell told them. "One of the ways they're responding is to burn natural gas."

Environmental groups have favored FPL's proposed use of natural gas because the fuel burns more cleanly than oil.

Yet the coalition reiterated its concern that, if a new 1,100-megawatt plant is built be-

> "I'm very concerned that we're not getting the proper information from FPL. We're hoping the (Department of Environmental Protection) will give us a hand."
>
> **CLARENCE TROXELL,**
> Manatee Citizens Against Pollution

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(page 2 of 2)

side the existing 1,600-megawatt plant, air pollution from the Parrish operation could increase substantially.

FPL intends to use the newer, more-efficient gas-burning plant, Bedwell said, and cut back operations at the old plant.

"Its level of pollution will be miniscule" compared to the older plant, Bedwell said.

As Florida's population grows and its demand for electricity increases, FPL may have to use both plants at full capacity, Troxell countered.

"Can you imagine what the emissions are when it all runs at 100 percent? Pretty damn high."

The coalition is also questioning the Parrish plant's NOx emission figures.

FPL has said it has reduced its NOx emissions rate since it installed new burners in 2000.

Troxell quotes data indicating the rate may have increased. Either the burners don't work as expected or NOx rates reported prior to 2000 were in error, Troxell said.

"I'm very concerned that we're not getting the proper information from FPL," Troxell said. "We're hoping the DEP will give us a hand."

Bedwell said he will look into the reports.