



# Florida Department of Environmental Protection

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August 3, 2007

Electronic Mail – Received Receipt Requested

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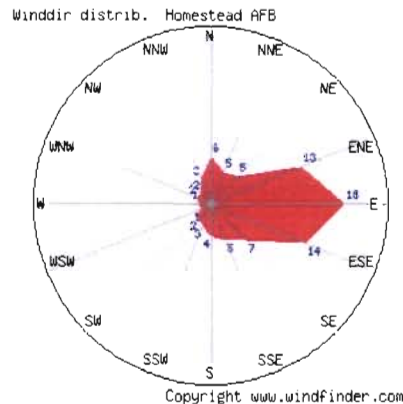
Mr. H. O. Nunez, Plant General Manager  
Florida Power & Light Company  
Turkey Point Fossil Plant  
9700 Southwest 344<sup>th</sup> Street  
Homestead, Florida 33035

Re: Turkey Point Fossil Power Plant Units 1 and 2  
DEP File No. 0250003-008-AC  
BART Determination Application – Request for Additional Information

Dear Mr. Nunez:

The Department received your response to our request for additional information letter on July 6, 2007. However, we have deemed your application still incomplete for the reasons given below, and require submittal of additional information to process the application.

For reference and to again establish perspective for this review, the Turkey Point Fossil Plant is located 20 kilometers to the East of the Everglades National Park Class I Area as indicated in the map below. The wind direction is often from the East as shown in the December 2006 wind rose for the Homestead Air Force Base reproduced below.



We have reviewed the responses to our most recent letter. These suggest that FPL does not believe it is cost-effective to implement any measures to ameliorate visibility in the Class I area that directly control particulate emissions such as electrostatic precipitators (ESPs) of the kind that provided a clear improvement in the visibility around Port Everglades.

We reviewed one of the recent submittals by the company to the Public Service Commission (PSC) Docket Item No. 060007-EI (March 30, 2006 Supplement). According to that submittal, the reburn or low nitrogen oxides (NO<sub>x</sub>) burners (LNB) projects at Turkey Point are presently on hold.

NO<sub>x</sub> is not covered by the BART rule because of the overall expectation that the NO<sub>x</sub> projects conducted under the Clean Air Interstate Rule (CAIR) will provide the reduction that fine particulate precursor. Therefore with the deferral of the NO<sub>x</sub> projects and the company's preliminary conclusion regarding the ESPs, implies that little amelioration of regional haze will occur in the Class I area due to actions at Turkey Point.

Later this year, another rule (Reasonable Further Progress) aimed at insuring regional air quality improvement will require certain facilities to evaluate the possibility of sulfur dioxide (SO<sub>2</sub>) emissions reduction. Turkey Point Fossil Plant is one of those facilities. This will again require evaluations of a fine particulate precursor.

It may be possible, for example, to implement multi-pollutant projects that may be cost-effective when considering all pollutants and overall benefits on regional visibility. For example the combined emissions of NO<sub>x</sub> and SO<sub>2</sub> were about 20,000 tons in 2005. A conceivable example could be ammonia injection in the furnace to reduce NO<sub>x</sub> and injection of sorbent in ducts (or elsewhere) to reduce SO<sub>2</sub> (without building a large wet scrubber) in conjunction with ESPs or baghouses for particulate control (including fine particles). There would also be environmental benefits by reducing sulfate deposition in the Everglades.

Please resubmit the responses to our previous questions with consideration to the multi-pollutant control prospects of an integrated approach for the various programs designed to address regional haze, especially for the Class I areas. We are available to discuss the details of our past requests and of the concepts discussed above. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

*The processing of this application is under time constraints. The Division of Air Resource Management has a goal to finalize all BART determinations by October 1, 2007. The Department must submit a state implementation plan (SIP) to EPA by December 17, 2007, identifying all BART determinations. Because of the timing of the rule and submittal of the applications, you are being granted a limited time to submit the requested information. Please provide any additional information by September 15, 2007.*

If you have any questions, please contact me at 850-921-9523 or Mr. Tom Cascio at 850-921-9526.

Sincerely,



A. A. Linero, P.E.  
Program Administrator  
Permitting South Section

AAL/tbc

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