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BUREAU OF AIR REGULATION

February 6, 2007

Trina Vielhauer
Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulations, Bureau Chief
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: **FPL Turkey Point Expansion Project**
PA 03-45 Conditions of Certification & PSD-FL-338
Sulfur Sampling Requirement for Ultra Low Sulfur Distillate Fuel Oil

Dear Ms. Vielhauer,

FPL's Turkey Point Expansion Project Condition of Certification XXVIII.H. 3. b. and Prevention of Significant Deterioration (PSD) permit PSD-FL-338 Section III. A. 25. b. read as follows:

"Compliance with the distillate fuel oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to each Compliance Authority before initial startup. Sampling the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. More recent versions of these methods may be used. ..."

In accordance with these conditions, FPL is hereby submitting the analytical results for the sulfur sampling of the distillate fuel oil. Please note the result is 0.00065 %, which is well within the 0.0015% limit. In addition the test method used for the analysis, ASTM D5354 is the current industry standard for ultra low level sulfur determinations.

Please let me know if you have any questions and/or require additional information. You can reach me at (561) 691-7518.

Sincerely,

A handwritten signature in cursive script that reads "Barbara P. Linkiewicz".

Barbara P. Linkiewicz

Director of Environmental Licensing
Florida Power & Light Company

cc: Darrel Graziani, DEP Southeast District Office
Errin Pichard, DEP Division of Air Resource Management
Tim Gray, DEP Southeast District Office
Ray Gordon, DERM
Mike Halpin, DEP Siting Office

To Whom It May Concern

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 A CIRCULAR MILLS COMPANY
 PART TO THE PG&T
 SA YBOLT LP
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 33318
 Phone: (954)524-8772
 Fax: (954)524-2377
 E-mail:
 Saybolt.flauderale@correlab.com
 Handled by: Armando Mejia

Reference
 Report no. 13056/1666 .00.L/07
 Report date 05/Feb/2007
 Object Analysis & Sampling
 Product Ultra Low Sulfur Diesel
 Location FPL, Turkey Point , Florida
 B/L Date

Sample submitted as Ultra Low Sulfur Diesel
 Received Sampled by Saybolt Inspector
 Marked SHORE TANK# 520A (U,M,L COMPOSITE)
 Date of sampling 02/Feb/2007
 Testing completed 02/Feb/2007 Time 18:40
 Sealed N/A
 Lab number 2006

CERTIFICATE OF ANALYSIS

Test	Analyte	Unit	Method	Specification	Result	
					Prefix	Figure
API Gravity at 60°F	API Gravity	API	ASTM D 4052	30 min		37.55
Sulfur Content	Sulfur (ppm)	mg/kg	ASTM D 5453	14 max		6.5
Sulfur Content	Sulfur	wt%	ASTM D 5453	0.0014 max		0.00065

Precision parameters apply in the evaluation of the test results specified above. Please also refer to ASTM D3244 (except for analysis of RFG), IP367 and appendix E of IP standard methods for analysis and testing with respect to the utilization of test data to determine conformance with specifications.
 This report is issued in accordance with the General Terms and Conditions of Saybolt Saybolt LP - Ft. Lauderdale, FL and the recipient is deemed to have full knowledge thereof.

Remarks

All manual gauges, temp. and samples in accordance with API MPMS Chapt. 3.1A, 7, 8.1 and 8.2.
 Vol.corr. for temp. based on ASTM D1250 or terminal/customer supplied tables, for which Saybolt can assume no responsibility.