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DIVISION OF AIR
RESOURCE MANAGEMENT



January 20, 2012

Jeff Koerner – Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Project No: 0250003-018-AC

RE: Request To Modify Turkey Point Plant BART Permit – 0250003-016-AC

Dear Mr. Koerner:

Due to the changes brought about by the vacature of the Clean Air Interstate Rule (CAIR) which relied on CAIR equaling BART, EPA's proposal that the Cross State Air Pollution Rule (CSAPR) will now equal BART, the Court's recent stay of CSAPR, and Florida Power & Light's fleet wide modernizations, the mission for Turkey Point (PTF) Units 1&2 has evolved substantially since the facility's original BART Determination of January 2007. As a result of these changes we are proposing modifications to the facility's BART Air Construction Permit 0250003-0016-AC.

The original BART Determination for PTF 1&2 was based on Particulate Matter (PM) only, since CAIR=BART for SO₂ and NO_x. At that time it was recognized that sulfate was the main contributor of visibility impacts to nearby Everglades National Park (ENP), and PM played a much lesser role. To address the PM impacts by way of the BART Air Construction Permit, new dust collectors were considered as BART, as the ESP option for PM control was determined to be cost prohibitive, i.e. \$10,624 per ton of PM removed and \$134 million per Deciview (Dv) of visibility improvement. Visibility modeling for PTF 1&2 for the baseline period of 2001-2003 showed that the 8th highest visibility impact from PTF 1&2 to ENP was 8.23 Dv with the following individual contributions:

| %SO ₄ | %NO ₃ | %OC | %EC | %PMC | %PMF |
|------------------|------------------|-----|-----|------|------|
| 91.7 | 5.9 | 0.2 | 0.9 | 0.3 | 1.1 |

Recognizing that sulfate was the main contributor of visibility impacts to ENP, the BART Air Construction Permit also required a reduction in fuel oil sulfur from 1.0% sulfur by weight to 0.7% sulfur by weight.

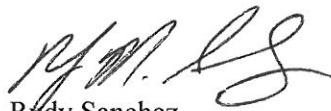
As mentioned above, the mission for PTF has changed substantially since the original BART Determination, and the more recent modification to the BART Air Construction Permit which went Final only late last month. As a result of the changed mission and the recognition that sulfate is by far the main contributor of visibility impacts to ENP, FPL requests the Department modify the existing BART Air Construction Permit to reflect:

- PTF 2 is designated as a permanent synchronous condenser resulting in a 50% plant-wide reduction in SO₂ through a permit limit for no fossil fuel combustion on Unit 2.
- Maintain the permit limit of 0.7% sulfur fuel oil on PTF 1 which is another 15% plant-wide reduction for a total reduction of 65% from baseline.
- Limit the Unit 1 fuel oil firing capability to 25% capacity from the effective date of BART (12/31/2013) until June 1, 2017 or the effective date of the Mercury Air Toxics Standards (MATS) Rule, whichever is sooner. The unit will be limited to 8,760,000 MMBtu of 0.7% sulfur #6 fuel oil annually, fired singly or in combination with natural gas. This, in conjunction with Unit 2, is a 91% plant-wide reduction in the Potential To Emit SO₂.
- The proposed MATS Rule includes a limited use provision for oil combustion i.e. 8% capacity. FPL intends to take a permit limit on oil combustion for Unit 1 to remain below the threshold, or install an ESP if additional oil capability is needed. A permit limit of 8% oil operation, for example, would represent approximately a 95% reduction of the annual SO₂ Potential To Emit.
- Due to the limited use of oil on Unit 1, the nearly negligible visibility impacts from PM, and the little incremental benefit of a new dust collector, eliminate the requirement to install the ~3.7 million dollar new dust collector on Unit 1 and continue to use the existing dust collector.

These changes to PTF 1&2, in conjunction with the conversion of Riviera Units 3&4 and the proposed modernization of Port Everglades Units 1, 2, 3, & 4 to combined cycle gas-fired units, represent significant reductions in SO₂ to the South Florida airshed and lessen the visibility impacts to Everglades National Park. If the Department agrees with the proposed changes above we would appreciate your timely confirmation. Otherwise in the near future we will have to initiate the engineering and procurement process for new dust collectors at a substantial cost, perhaps needlessly.

If needed, I have enclosed for your use the R.O. Statement Page and the P.E. Certification page.

We look forward to working with the Department to accommodate this change. If you have any questions, or require additional information, please call me at 305-242-3822 or Kevin Washington at (561) 691-2877.



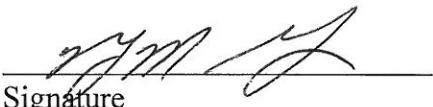
Rudy Sanchez
Turkey Point General Manager and R.O.

Attachments:2

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

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| 1. Owner/Authorized Representative Name : Rudy Sanchez |
| 2. Owner/Authorized Representative Mailing Address... Organization/Firm: FPL Turkey Point Fossil Power Plant Street Address: 9700 SW 344 th Street City: Homestead State: Florida Zip Code: 33035 |
| 3. Owner/Authorized Representative Telephone Numbers... Telephone: (305) 242 - 3822 ext. Fax: (305) 242 - 3813 |
| 4. Owner/Authorized Representative E-mail Address: rudy_sanchez@fpl.com |
| 5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  Signature Jan 20, 2012 Date |

Professional Engineer Certification

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| 1. Professional Engineer Name: Edward Preast Registration Number: 33225 |
| 2. Professional Engineer Mailing Address... P.O. Box 14000 Organization/Firm: Florida Power & Light Company Street Address: 800 Universe Blvd. City: Juno Beach State: Florida Zip Code: 33408 |
| 3. Professional Engineer Telephone Numbers... Telephone: (561) 691- 2679 ext. Fax: (561) 691- 7049 |
| 4. Professional Engineer E-mail Address: ed_preast@fpl.com |
| 5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <i>Edward Preast</i> Signature _____ Date <u>01/20/12</u> (seal) |