



Carlos A. Gimenez, Mayor

Department of Regulatory and Economic Resources

Environmental Resources Management

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December 21, 2016

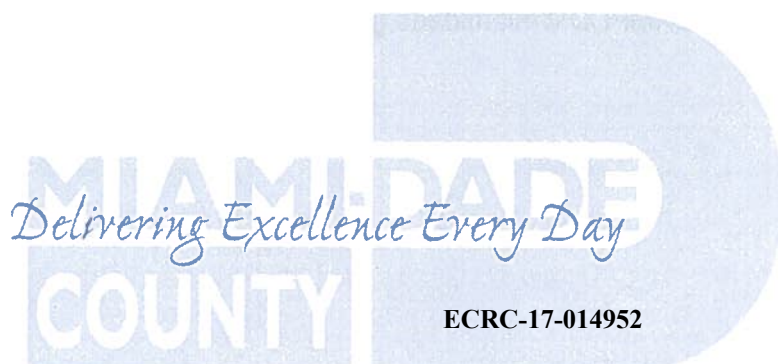
Mr. Matthew J. Raffenberg, Director
Environmental Licensing and Permitting
Environmental Services Department
Florida Power & Light Company
700 Universe Blvd (JES/JB)
Juno Beach, FL 33408

Re: Site Assessment Plan (SAP) for Ammonia dated September 14, 2016 for FPL's Turkey Point Facility located at, near, or in the vicinity of 9700 SW 344 Street, Unincorporated Miami-Dade County, Florida (DERM IW-3, IW-16, IW5-6229, DWO-10, CLI-2014-0312, CLI-2016-0303, HWR-851).

Dear Mr. Raffenberg:

The Department of Regulatory and Economic Resources, Division of Environmental Resources Management (DERM) acknowledges receipt (received September 14, 2016) of the above referenced Site Assessment Plan (SAP) submitted in response to Condition 34.a. of the Consent Agreement Addendum executed on August 15, 2016 and hereby approves the Plan subject to the following:

1. Pursuant to the aforementioned Addendum, FPL is required to submit an SAP which shall allow for the identification of the source(s) of the ammonia exceedances and delineation of the vertical and horizontal extent of the subject ammonia exceedances in surface water. Said plan shall be adequate to address the ammonia exceedances to the surface waters surrounding the facility, including but not limited to, waters tidally connected to Biscayne Bay. Therefore, DERM requires that in addition to the surface water sampling locations proposed in FPL's submittal, the additional locations shown in Attachment A shall also be sampled and analyzed for the parameters identified in Table 1 of the SAP. Several of the monitoring sites shall also include the collection of a water sample only at the deepest depth interval, to be analyzed for tritium as noted on Attachment A. DERM will determine which tritium samples shall be submitted for laboratory analysis based on a review of the results submitted in the Site Assessment Report (SAR); therefore, these tritium data shall not be subject to the 60-day deadline specified below.
2. To quantify the impact of the tidal influence on surface water quality in the area DERM requires sampling at both high tide and low tide at each surface water sampling location with tidal connection to Biscayne Bay.



3. The SAP asserts that “a review of available surface water quality data by FPL for Biscayne Bay indicates that ammonia concentrations have been recorded above the DERM criteria at many locations unrelated to Turkey Point. To allow for a comprehensive review of the required SAR, all existing available surface water quality data from areas in the vicinity of, but outside the potential influence of, the Turkey Point facility shall be provided and evaluated in the SAR to establish potential background ammonia concentrations in the surface waters. DERM will evaluate any background information provided and the merits of any conclusions regarding potential background contributions to the documented ammonia impacts. If the background information is deemed inadequate or inappropriate, FPL may be required to submit a background sampling plan to be reviewed and approved by DERM.
4. DERM acknowledges the report dated September 16, 2016 –Turkey Point Cooling Canal Nutrient Management Plan - submitted in fulfillment of Paragraph 21.b of the FDEP/FPL Consent Order OGC No.16-024. However, notwithstanding said document, FPL shall provide information regarding how the nutrient sources and nutrient fluxes within the Cooling Canal System may contribute to ammonia exceedances referenced in the August 15, 2016 Consent Agreement Addendum.
5. Porewater sampling for the same parameters listed in Table 1 of the SAP is recommended in association with the sediment sampling activity in order to characterize nutrient levels and nitrification/denitrification processes within the sediment layer. Sediment sampling shall be conducted at sampling locations with tidal connection to Biscayne Bay or Card Sound.

Therefore, within sixty (60) days of receipt of this letter, submit to DERM for review and approval two (2) copies of the required Site Assessment Report, one paper and one electronic PDF on CD, prepared in accordance with Section 24-44(2)(j)(iv), of the Code of Miami-Dade County, and which shall fulfill the requirements of Conditions 34.a. and 34.b. of the August 15, 2016 Consent Agreement Addendum and which includes the modifications noted above. The SAR shall include a proposal for a water quality monitoring program to evaluate the potential for temporal variation in the degree and extent of the ammonia plume as well as a proposal for monitoring subsequent to the implementation of an approved Corrective Action Plan. A review fee of one thousand three hundred and fifty dollars (\$1350) shall be included with the submittal.

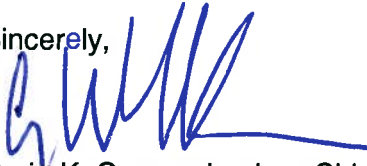
DERM has the option to split any samples deemed necessary with the consultant or laboratory at the subject site. The consultant collecting the samples must perform field sampling work in accordance with the Standard Operating Procedures provided in Chapter 62-160, Florida Administrative Code (FAC), as amended. The laboratory analyzing the samples must perform laboratory analyses pursuant to the National Environmental Laboratory Accreditation Program (NELAP) certification requirements. If the data submitted exhibits a substantial variance from the DERM split sample analysis, a complete resampling using two independent certified laboratories will be required.

DERM shall be notified in writing a minimum of three (3) working days prior to the implementation of the referenced plan including any sampling events. Email notifications shall be directed to DERMPCD@miamidade.gov. Please include the DERM case number HWR-851 on all correspondence.

Any person aggrieved by any action or decision of the DERM Director may appeal said action or decision to the Environmental Quality Control Board (EQCB) by filing a written notice of appeal along with submittal of the applicable fee, to the Code Coordination and Public Hearings Section of DERM within fifteen (15) days of the date of the action or decision by DERM

Please let us know if you have any questions regarding this matter. The Department will arrange a meeting, at your request, to discuss any issues relating to the above.

Sincerely,



Craig K. Grossenbacher, Chief
Water Resources Coordination Division

Attachment

c: Scott Burns, FPL - Scott.Burns@fpl.com
Alan Katz, FPL - Alan.Katz@fpl.com
Lee Hefty, DERM Director
Wilbur Mayorga, DERM
Lisa Spadafina, DERM
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Barbara Brown, DERM

