



Florida Municipal Power Agency

January 21, 2015

Justin Green
Siting Coordination Office (SCO)
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

RE: Cane Island Power Park;
Petition for Modification of Site Certification PA98-38

Dear Mr. Green,

Florida Municipal Power Agency (FMPPA) / Kissimmee Utility Authority (KUA), joint owners/operators of the Cane Island Power Park (CIPP), were issued the original Conditions of Certification PA98-38 for Cane Island Power Park on 11/23/1999 which was last modified on 04/22/2011 (PA98-38F).

FMPPA/KUA would like to submit to your office this petition for modification of the conditions of certification for the Cane Island Power Park facility. This petition is being submitted pursuant to Section 403.516(1), Florida Statutes, and Rule 62-17.211, Florida Administrative Code (F.A.C.). A check is enclosed in the amount of \$10,000, made payable to the Department of Environmental Protection, as the required fee for this petition for modification under Rule 62-17.293(1)(c)2.a, F.A.C. Copies of this petition are being provided to the parties of record to this certification proceeding, as indicated on the distribution list that is attached to the end of this letter. The proposed modification and the justification for the modification are discussed below.

FMPPA/KUA request that Section B.1.K.3.a.(12), restated as follows:

“There shall be no net increase of Total Nitrogen and Total Nitrates in pounds per day, on an annual basis, introduced back into the TWA reclaimed water pipeline than was received from the TWA in the reclaimed water used for supply. Calculations shall be made on the following basis: Total weekly flow in Million Gallons x 8.34 x concentration in mg/l for each parameter.”

be removed from the CIPP conditions of certification.

The Cane Island Power Park receives reclaimed water from the Tohopekaliga Water Authority (TWA). The TWA reclaimed water is used for makeup water to the three Cane Island cooling towers. The existing Cane Island facility discharge consists of cooling water blowdown, low volume wastes, and chemical and non-chemical metal cleaning wastes that are returned back to the TWA.

The industrial wastewater monitoring under Section B.1.K.3.a.(12) requires sampling and calculation of any net change in total nitrogen and total nitrates in the system to show that there is no net increase on an annual basis in the total quantity of nitrogen or nitrates from the use of reclaimed water in the Cane Island units. Under the required monitoring, FMPA/KUA have been able to show that the plant meets this requirement since none of the plant processes would or have ever contributed to the nitrogen or nitrate loading of reclaimed water returned to TWA.

Since the original certification, the TWA reclaimed water has added additional waste streams into its reclaimed water supply pipeline prior to receipt at Cane Island Power Park. These additional waste streams have caused a fluctuating nitrate loading in the TWA reclaimed water supply, which creates difficulties in calculating the net nitrate based on a weekly grab sample of the reclaimed water returned to TWA. However, CIPP has not caused any increase in total nitrogen or nitrates in the wastewater returned to TWA.

FMPA/KUA and TWA have discussed this and agree that this requirement is no longer necessary to ensure that TWA is meeting the downstream nitrate discharge limitations required in the TWA permit issued by the Department for TWA's operations. We also agree that continuing this monitoring or creating a more complex sampling regimen to capture and calculate the net nitrate loading at Cane Island Power Park has no value to TWA or its compliance with its permit, or to FMPA/KUA. The requested modification will not cause compliance issues for TWA's separate permit. The requested modification will have no impact on the environment or on CIPP's operation. No other changes to the conditions of certification are required to implement this modification.

Thank you for your attention to and consideration of FMPA/KUA's petition to modify the Site Certification for the Cane Island Power Park. We request that the Department process this petition for modification in accordance with Rule 62-17.211(1), F.A.C.

If you or any reviewing agencies have any questions regarding this submittal, please do not hesitate to contact Michelle Robinson at (407) 355-7767 or via email at Michelle.Robinson@fmipa.com.

Sincerely,



Frank Gaffney
Assistant General Manager, Power Resources
Florida Municipal Power Agency

cc:

Ann Seiler – Florida DEP – Siting Office
Jenny Farrell – Florida DEP - Central District

Justin G. Wolfe, Florida DEP - OGC
Jay Butters - KUA
Larry Mattern - KUA
Jody Finklea – FMPA
Michelle Robinson - FMPA
Susan Schumann - FMPA

Doug Roberts – Hopping Green & Sams