

Turkey Point Units 6 & 7
COL Application
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CHAPTER 1 INTRODUCTION

1.1 THE PROPOSED PROJECT

This section introduces the applicant and owner and provides a brief description of the proposed project, including descriptions of the site location, the selected reactor type and other plant design features, pre-application public participation activities, and major project activity dates.

Pursuant to the Atomic Energy Act of 1954, as amended, and Title 10 of the CFR, the NRC is responsible for licensing the construction and operation of domestic nuclear power plants. In accordance with the provisions of 10 CFR Part 52, Subparts B (Standard Design Certifications) and C (Combined Licenses), and supporting guidance, Florida Power & Light Company (FPL) has developed a COL Application for submittal to the NRC for construction and operation of two new nuclear generating units, Units 6 & 7, at the existing Turkey Point plant property in Miami-Dade County, Florida. The COL Application includes an Environmental Report (ER), in accordance with the provisions of 10 CFR Part 51 and the National Environmental Policy Act of 1969 (NEPA), as amended. The ER provides an analysis of the reasonably foreseeable impacts to the environment from site preparation, construction, operation, and decommissioning of Units 6 & 7.

This ER follows the content and organization of the NRC's *Standard Review Plans for Environmental Reviews for Nuclear Power Plants*, also known as NUREG-1555, Revision 0 (October 1999). Available draft revisions to this guidance have been considered, as practicable. Pursuant to 10 CFR Part 51, the NRC is required to perform a review of the environmental impacts of the construction and operation of Units 6 & 7; this ER supports that review. 10 CFR Part 51 requires that environmental impacts from the proposed project be evaluated and described in a concise, clear, and analytical manner. This report describes the project and potential alternatives and the methods and sources used in the environmental impact analysis.

Environmental issues identified in this ER are evaluated using a three-tier standard of significance as defined in 10 CFR Part 51, Subpart A, Appendix B, Table B-1, Footnote 3, as follows:

SMALL — Environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource.

MODERATE — Environmental effects are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.

LARGE — Environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource.

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1.1.1 PURPOSE AND NEED

FPL's purpose is to provide additional baseload generation to maintain system reliability, increase fuel diversity, and allow progress toward meaningful CO₂ emissions reductions. The need for Units 6 & 7 has been determined by the state of Florida as described in Chapter 8. The proposed action is for the NRC to authorize FPL to construct and operate two PWRs at the Turkey Point plant property.

1.1.2 PROJECT DESCRIPTION

This subsection provides a brief summary of project information. Subsequent sections, particularly Chapter 3, give additional details of the proposed project.

1.1.2.1 The Applicant and Owners

FPL is the owner of the Turkey Point plant property and the existing power plants. FPL would own proposed Units 6 & 7. FPL is the operator of the existing power plants and would be the operator of Units 6 & 7. The new units would be operated as baseload plants to supply the needs of the FPL service territory. Additional information about FPL is provided in Part 1 of this COL Application.

1.1.2.2 Site Location

The Turkey Point plant property comprises approximately 11,000 acres in unincorporated southeast Miami-Dade County, Florida, east of Florida City and the City of Homestead and bordered by Biscayne Bay to the east. Currently located on the Turkey Point plant property are five FPL power plants: two natural gas/oil steam electric generating units (Units 1 & 2), two pressurized water reactor nuclear units (Units 3 & 4), and one natural gas combined-cycle steam electric generating unit (Unit 5). [Figure 2.1-4](#) shows the location of the Turkey Point plant property and regional features of the area. The new units would be constructed on an approximately 218-acre area (the Units 6 & 7 plant area) south of Units 3 & 4. [Figure 2.1-3](#) shows the location of Units 6 & 7 on the Turkey Point plant property. Additional information regarding the Turkey Point plant property and the Units 6 & 7 plant area is provided in [Section 2.1](#).

1.1.2.3 Reactor Information

FPL proposes to build and operate two AP1000 units, a nuclear plant design certified under 10 CFR 52, Subpart B. The total gross thermal MW output per unit is 3415 MWt with a nominal net electrical output of at least 1000 MWe. Additional details on the AP1000 design are provided in [Section 3.2](#).

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1.1.2.4 Cooling System Information

During normal operation of Units 6 & 7, waste heat would be dissipated by mechanical draft cooling towers. Two sources of makeup water are planned to replace cooling tower blowdown for Units 6 & 7. The primary source would be water reclaimed for reuse after processing by the Miami-Dade Water and Sewer Department, conveyed via pipelines to the Turkey Point plant property. An onsite FPL reclaimed water treatment facility would further treat the reclaimed water for use in the cooling system. When reclaimed water cannot supply the quantity and/or quality of water needed for the circulating water system, a second source for makeup water would consist of radial collector wells that would withdraw saltwater from under Biscayne Bay. Each radial collector well would consist of a central reinforced concrete caisson extending below the ground level with laterals projecting horizontally from the caisson. The well caissons would be located on the Turkey Point peninsula, east of the existing units.

Blowdown would control the accumulation of dissolved solids in the cooling system. Blowdown water would be discharged through the use of deep injection wells to the Boulder Zone, a cavernous, high-permeability South Florida geologic horizon located at depths of approximately 2800–3500 feet in the lower Floridan aquifer.

Descriptions of the cooling system, makeup water sources, and the anticipated modes of cooling system operation and discharge are provided in [Sections 3.3](#) and [3.4](#).

1.1.2.5 Transmission System Information

Eight 230 kV transmission lines currently connect the existing Turkey Point units to the transmission system by way of two corridors, one proceeding to the north and one to the west. Two new 500 kV circuits and three new 230 kV circuits would be built to connect Units 6 & 7 to the electric grid. Plans are for the new transmission lines to proceed from the a new onsite substation (Clear Sky), with the 500 kV circuits connecting to the existing Levee substation and the 230 kV circuits connecting to the existing Turkey Point, Davis, and Pennsuco substations. Final transmission routes are selected through the state of Florida's Power Plant Siting Act (PPSA) process. To the extent practicable, new transmission lines would be routed in existing rights-of-way owned by FPL, in many places adjacent to existing transmission lines. Additional information on proposed transmission corridors serving Units 6 & 7 is provided in [Sections 2.2](#) and [3.7](#). The proposed configuration of the transmission system for Units 6 & 7 is shown in [Figure 2.2-5](#).

1.1.2.6 Public Involvement

FPL has an active community and public outreach program. The outreach principles include:

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- Open, honest, and accessible communication with the general public and all key stakeholders
- Keeping state and local agencies and business organizations informed regarding the progression of the proposed project by meeting and briefing public officials from the affected area
- Using media opportunities to explain the project planning and licensing processes
- Actively soliciting input on proposed plans for the project, including any offsite facility and transmission and pipeline corridor location selection, and answering questions and inquiries that come to FPL. Special efforts are made in the ER preparation process to solicit and incorporate inputs on matters of environmental justice

These activities would continue as the regulatory review processes progress at the local, regional, state, and federal levels.

1.1.2.7 Schedule for Major Activities

No site preparation activities would occur until the site is certified under the PPSA and the required U.S. Army Corps of Engineers permits are obtained. The project schedule assumes a 30-month duration for preconstruction activities. Unit 6 construction would have an approximate 48-month duration for construction activities and an approximate 6-month duration for fuel load and startup. Unit 7 construction is planned to begin approximately 24 months after Unit 6 construction initiation and would follow an identical construction and fuel load/startup duration. Units 6 & 7 would initiate electric generation output in or about 2018 and 2020, respectively. A description of the construction schedule and milestone activities is included in [Section 3.9](#).

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1.2 STATUS OF REVIEWS, APPROVALS, AND CONSULTATIONS

In this section, the federal, state, regional, and local environmental protection licenses, permits, reviews, approvals, and consultations, collectively called authorizations, that are applicable to the proposed action to construct and operate Units 6 & 7 are identified. The information listed below is included in [Table 1.2-1](#) for each authorization:

- Jurisdictional agency
- Authority, law, or regulation that dictates the requirement
- Description of the requirement
- License or permit number as applicable
- Date of application or date issued
- Description of the activities covered

FPL is in the process of initiating actions to obtain the necessary authorizations. Appendix A contains copies of consultation letters and responses received to date. The bulleted items below describe some of the principal required authorizations.

- *Endangered Species Act of 1973* (16 U.S.C. 1531-1544, as amended) — The *Endangered Species Act of 1973* requires federal agencies to ensure that agency action is not likely to jeopardize any species that is listed or proposed for listing as endangered or threatened. Depending on the action involved, the Act requires consultation with the U.S. Fish and Wildlife Service (USFWS) about effects on non-marine species, the National Marine Fisheries Service (NMFS) for marine species, or both. Because of the proximity of the Turkey Point site to the Atlantic Ocean, consultation with the USFWS and the NMFS is required.
- *National Historic Preservation Act of 1966* (16 U.S.C. 470) — The *National Historic Preservation Act of 1966* requires that federal agencies that have the authority to license an initiative consider (before the license is issued) the effects of the initiative on historic properties or properties eligible for protection under the National Historic Preservation Act.
- *Federal Coastal Zone Management Act of 1972* (16 U.S.C. 1451-1456) — The *Federal Coastal Zone Management Act* imposes requirements on applicants for a federal license to conduct an activity that could affect a coastal zone. The Act requires the applicant to certify to the licensing agency that the proposed activity would be consistent with the state's federally approved coastal zone management program. FPL would certify to the NRC that the

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proposed project is consistent with the federally approved state of Florida Coastal Zone Management Plan.

- *Federal Water Pollution Control Act of 1972, as amended by the Clean Water Act of 1976* (33 U.S.C. 1251, et seq.), also known as the “Clean Water Act” —The *Clean Water Act, Section 401*, requires any federal license applicant, who plans to conduct activities that might result in a discharge into navigable waters, to provide the licensing agency a certification from the state that the discharge would comply with applicable Clean Water Act requirements; the *Clean Water Act, Section 404*, requires applicants proposing the discharge of dredge or fill materials into “waters of the United States” to obtain a permit for this activity from the U.S. Army Corps of Engineers.
- *Rivers and Harbors Act of 1899* (33 U.S.C.401 et. seq.) The *Rivers and Harbors Act, Section 10*, prohibits the creation of any obstruction, and prohibits the excavation or filling, within navigable waters of the United States without prior authorization from the U.S. Army Corps of Engineers.
- The Florida Power Plant Siting Act, Sections 403.501-403.518, Florida Statutes, mandates a site certification process for obtaining a single site-related license that will include state, regional, and local requirements for construction and operation of a power plant and associated facilities of the type and magnitude being proposed by FPL.

Preconstruction activities, according to NRC requirements, are those that may be initiated before a COL or LWA is issued. Pursuant to 10 CFR 50.10(c), “No person may begin the construction of a production or utilization facility on a site on which the facility is to be operated until that person has been issued either a construction permit under this part, a combined license under part 52 of this chapter, an Early Site Permit authorizing the activities under paragraph (d) of this section, or a LWA under paragraph (d) of this section.” NRC regulations at 10 CFR 50.10(a) define activities which are (and are not) considered to be construction. Activities not defined as construction may be initiated without prior NRC authorization. However, according to Florida PPSA requirements, no preconstruction or construction activity may occur before site certification is issued.

A COL applicant may begin certain preconstruction activities without prior NRC authorization before receipt of a COL or LWA, such as:

- Preconstruction plans and exploration activities such as soil boring/sampling, installation of monitoring wells, or installation of additional geophysical borings as defined in 10 CFR 50.10(a)(2) and the removal and/or relocation of existing facilities in the new plant footprint
- Site preparation activities such as installation of temporary facilities, construction support facilities, service facilities, utilities, docking and unloading facilities, excavations for facility

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structures and foundations, and construction of structures, systems, or components (SSCs) that do not constitute construction as defined by 10 CFR 50.10(a)(1)

On December 20, 2007, the Miami-Dade County, Florida, Board of County Commissioners approved Resolution Z-56-07 (Miami 2007), approving, with conditions, FPL's request for unusual use of the proposed plant site to allow construction and operation of Units 6 & 7 and ancillary structures and equipment.

Section 1.2 References

(Miami 2007) Resolution No. Z-56-07, Miami Dade County Clerk of the Board, http://www.miamidade.gov/COB/library/Zoning_Resolutions/Z-56-07.pdf, Accessed February 24, 2009.

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Table 1.2-1 (Sheet 1 of 6)
Authorizations for Turkey Point Units 6 & 7

Jurisdictional Agency	Authority, Law, or Regulation	Description of Requirement	License/Permit and/or Applicability ^(a)	Date of Application or Date Issued	Activity Covered
FEDERAL AUTHORIZATIONS					
NRC	10 CFR Part 30	By-product license	(3)	Application submitted 06/30/2009	Possession of by-product material.
NRC	10 CFR Part 40	Source material license	(3)	Application submitted 06/30/2009	Possession of source material.
NRC	10 CFR Part 50	Licensing of nuclear power plant	(3)	Application submitted 06/30/2009	Approval for construction and/or operation of nuclear power plant.
NRC	10 CFR Part 51, 10 CFR Part 52	NRC approval of an environmental report	(2)	Application submitted 06/30/2009	Evaluation of environmental impacts from construction and operation of a nuclear power plant.
NRC	10 CFR Part 52	COL	(3)	Application submitted 06/30/2009	Safety review of the nuclear power plant site.
NRC	10 CFR Part 61	Licensing requirements for land disposal of radioactive wastes	(2)	Application submitted 06/30/2009	Land disposal of radioactive waste that contains by-product source and special nuclear material.
NRC	10 CFR Part 70	Special nuclear material license	(3)	Application submitted 06/30/2009	Possession of special nuclear material.
NRC	10 CFR Part 71	Packaging and transportation of radioactive material	(3)	Application submitted 06/30/2009	Packaging and transportation of licensed radioactive material.
DOE	Nuclear Waste Policy Act (42 U.S.C 10101 et seq.) and 10 CFR Part 961	Spent fuel contract	No. DE-CR01-09RW9012 (Unit 6) No. DE-CR01-09RW09013 (Unit 7) (3)	11/14/2008 11/14/2008	Disposal of spent nuclear fuel.

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**Table 1.2-1 (Sheet 2 of 6)
Authorizations for Turkey Point Units 6 & 7**

Jurisdictional Agency	Authority, Law, or Regulation	Description of Requirement	License/Permit and/or Applicability ^(a)	Date of Application or Date Issued	Activity Covered
USACE	Clean Water Act of 1976 / 33 U.S.C section 1344	Section 404 Permit	(1)	Application submitted 06/30/2009	Discharge of dredge and fill materials into waters of the United States.
USACE	Rivers and Harbors Act of 1899/ 33 U.S.C. section 401 <i>et. seq.</i>	Section 10 — Rivers and Harbors Act Permit	(1)	Application submitted 06/30/2009	Excavation or filling within navigable waters of the United States.
USFWS	16 U.S.C 1539(a)(1)(A); 50 CFR Parts 13, 17	Endangered species permit to take American crocodile during monitoring	TE092945-2 (1)	Expires 01/31/2015	Provides authorization to take (capture, examine, weigh, sex, collect tissue samples, mark, radio-tag, radio-track, relocate, release) endangered American crocodile individuals during population monitoring.
USFWS	16 U.S.C 703-712	Special purpose salvage permit, migratory birds	MB697722-1 Amendment (1)	07/28/2006	Provides authorization to: salvage dead migratory birds, abandoned nests, and addled eggs after nesting season; dead bald or golden eagles; and possess live migratory birds for transport to permitted rehabilitator.
USFWS	16 USC 703-7121 50 CFR Part 13: 50 CFR 21.41	Federal Fish and Wildlife Permit	MB135540-0 (1)	04/01/2008	Emergency relocation of active migratory bird nests when birds, nests, or eggs pose a direct threat to human health and safety or when the safety of the bird is at risk if the nest and/or birds are not removed.
STATE OF FLORIDA AUTHORIZATIONS					
FDEP, Siting Board	F.S. § 403.501-.518	Power plant site certification	(2)	Application submitted 06/30/2009	Construction and operation of a power plant with more than 75 MW of steam generated power and associated facilities.
<p>^a Pursuant to the Florida Electrical Power Plant Siting Act (PPSA) all state, regional and local permits, except for certain local land use and zoning approvals and certain state issued licenses required under federally delegated or approved permit programs, are covered under a single "Certification". Because the Certification is the sole license of the state and any agency required for construction and operation of the proposed electrical power plant, it is not necessary to apply for permits individually.</p>					

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Jurisdictional Agency	Authority, Law, or Regulation	Description of Requirement	License/Permit and/or Applicability ^(a)	Date of Application or Date Issued	Activity Covered
FDEP, USEPA Region IV review	F.A.C. 62-621	NPDES storm water operations permit for industrial activities	(3)	Application submitted 06/30/2009	Operation of an industrial facility.
FDEP	Chapter 403 F.S.	Exploratory well construction permit	(1)	Application submitted 01/20/2009	Allows for the construction of the exploratory well and dual-zone monitor well.
FDEP	Chapter 403 F.S.	UIC well construction permit	(1)	Application to be submitted 2010	Allows for the conversion of the exploratory well to an injection well and perform operational testing for up to 2 years.
FDEP	Chapter 403 F.S.	Class I well operation permit	(3)	Application to be submitted 2012	Allows for the operation of the injection wells. This permit must be renewed every 5 years.
FDEP, USEPA Region IV review	F.A.C. 62-212	Prevention of significant deterioration construction permit	(1)	Application submitted 06/30/2009	Construction and operation of facilities that generate air emissions.
FDEP, USEPA Region IV review	403.0885 F.S.	Modification of Industrial Wastewater Treatment Facility (IWW) permit	Modification to existing permit No. FL0001562 (2)	Application submitted 06/30/2009	Construction of Units 6 & 7 within the industrial wastewater facility.
FDEP/USEPA	F.A.C 62-25, 62-40	NPDES construction storm water permit	(1)	To be submitted 2 days prior to beginning construction	Construction of any facility that disturbs 1 acre or more.
Florida Fish and Wildlife Conservation Commission	F.A.C. 68A-9.002; 68A-25.002; 68A-27.003	Special purpose live-capture permit	WX06467 (1)	12/15/2006	Provides authorization for live-capture, insertion of data loggers in nests, and collection of samples, on FPL properties of American crocodiles for mark/recapture and scientific data collection; also provides for live-capture, relocation, and release of American alligators and Eastern indigo snakes and other endangered or threatened species or species of special concern.
FDEP	403.087, F.S. and F.A.C. 62-4, 62-520, 62-522, 62-528 62-550, 62-600, 62-601	Operation of Class V, Group 3 domestic wastewater injection (gravity flow) well	0127512-002-U0 (3)	01/23/2006	Operation of IW-1.

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Table 1.2-1 (Sheet 4 of 6)
Authorizations for Turkey Point Units 6 & 7

Jurisdictional Agency	Authority, Law, or Regulation	Description of Requirement	License/Permit and/or Applicability ^(a)	Date of Application or Date Issued	Activity Covered
FDEP	403, F.S. and F.A.C. 62-600, 62-601, 62-602, 62-620, 62-640, 62-699	Operation of domestic wastewater treatment facility (WWTF)	FLA013612 002-DW3P (3)	01/18/2006	Operation of Turkey Point Power Plant WWTF.
FDEP	F.A.C 62-213	Title V Operations Permit	FDEP 0250003- 010-AV (3)	01/01/2009	Operation of facilities that generate air emissions.
FDEP, South Florida Water Management District	F.A.C. 40B-3	Well Construction Permit	3807, 3808, 3809, 3810, 3811, 3812, 3813, 3814 (2)	01/14/2009	Construct, repair, modify, or abandon a well.
South Florida Water Management District	F.A.C. 40E-3	Well Abandonment Permit	#SF092308E, #SF092308F, #SF092308G, #SF092308H (2)	08/03/2008	Well abandonment permits.
State of Florida	F.A.C. 40E-3	Well Abandonment Permit	13-59-2241 through 13-59- 2260 (2)	02/19/2008	Application to construct, repair, modify, or abandon well.
FWCC	F.A.C. 68A-9.002, 68A-9.025, 68A-27	Carcass Salvage Permit	WS96468a (1)	10/21/2008	Salvage, mount, and display wildlife carcasses upon encounter for educational or scientific purposes.
FWCC	F.A.C 68A-9.002, 68A-27.005	Removal of nests and ospreys	WNO7311 (1)	07/20/2007	Removal and replacement of inactive nests of ospreys and other migratory birds.
FWCC	F.A.C 68A-9.002, 68A-9.025, 68A-27	Carcass Salvage Permit	WSO7667 (1)	12/21/2007	Salvage, mount, and display wildlife carcasses upon encounter for educational and scientific purposes.
OTHER STATE AUTHORIZATIONS					
Utah Department of Environmental Quality Division of Radiation Control	R313-26 of the Utah Radiation Control Rules	Revision of existing general site access permit	(3)	Annual authorization	Transport of radioactive materials into the state of Utah.

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Authorizations for Turkey Point Units 6 & 7

Jurisdictional Agency	Authority, Law, or Regulation	Description of Requirement	License/Permit and/or Applicability^(a)	Date of Application or Date Issued	Activity Covered
Tennessee Department of Environment and Conservation Division of Radiological Health	TDEC Rule 1200-2-10.32	Revision of existing Tennessee radioactive waste license-for-delivery	(3)	Annual authorization	Transport of radioactive waste into the state of Tennessee.
LOCAL AUTHORIZATIONS					
Miami-Dade County	Chapter 163 F.S.; Miami-Dade County Comprehensive Plan and adopted regulations	Land use and zoning approval (unusual use approval)	Miami-Dade County Board of County Commissioners Resolution Z-56-07 (1)	Issued 12/24/2007	Unusual use (zoning approval) to permit a nuclear power plant (atomic reactors) and ancillary structures and equipment.
Miami-Dade County	Chapter 163 F.S.; Miami-Dade County Comprehensive Development Master Plan (CDMP) and adopted regulations	CDMP text amendment	(1)	Application submitted 10/31/2008	Excavation for fill source.
Miami-Dade County	Miami-Dade County Ordinances	IW6 permit (industrial well field) for site investigation	Permit Numbers: 13-59-2241 through 13-59-2260 (1)	02/19/2008	Land use — nonresidential, within major well field protection areas not served by sanitary sewers.
Miami-Dade County Health Department	Chapter 373 F.S.	Water well construction permits	13-59-2241 to 13-59-2260 13-59-3795 to 13-59-3814 (1)	02/15/2008 1/14/2009	Well installation for hydrologic investigation.
Miami-Dade County	Miami-Dade County Code Chapter 24	Domestic wastewater annual operating permit	DWO-000010-2008/2009 (2)	Permit issued 04/15/2008	Stabilization treatment facility.

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Jurisdictional Agency	Authority, Law, or Regulation	Description of Requirement	License/Permit and/or Applicability ^(a)	Date of Application or Date Issued	Activity Covered
Miami-Dade County	Miami-Dade County Code Chapter 24	Operation of pollution control facility	IW5-006229-2008 (2)	Permit issued 10/01/2008	Operation of fleet vehicle maintenance facility that generates waste oil, coolant, and used batteries with a solvent wash tank and served by septic tank.
Miami-Dade County	Miami-Dade County Ordinances, Chapter 14	Burn Permit	8842, ODS 07200-00000-00017 (2)	Annual Permit issued 03/03/2009	Onsite combustion of construction debris.
Miami-Dade County	Miami-Dade County Ordinances, Section 24-35	IW5 Permit (or waiver)	IW-000016-2008/2009	Hazardous Waste Generator Permit issued 10/01/2008	Hazardous materials or hazardous waste-large user or generator.
Miami-Dade County	Miami-Dade County Code Chapter 24	Stratospheric Ozone Protection Annual Operations Permit	TP_APCF-001747-2008-2009 (1)	10/01//2008	Use of refrigerants R-12, R-22, R-502 for Robinair Recovery Units, Models 25200, 25200A, 25200B.
Miami-Dade County	Miami-Dade County Code Chapter 24	Industrial Waste Annual Operations Permit	TP_IW-000003-2008-2009 (2)	10/01/2008	Onsite disposal of Class III industrial solid waste consisting of earth and earth-like products, concrete, rock, bricks, and land clearing debris.
Miami-Dade County	Miami-Dade County Ordinance 89-104	Marine Facilities Annual Operations Permit	TP_MOP-000072-2008 (2)	10/01/2008	Operation of 1 wet slip, 1 dry slip, 2 commercial vessels.
South Florida Water Management District (SFWMD)	Chapter 373 F.S.	Water well construction permits	SF092308A-SF092308H SF123008A-SF123008E	9/23/2008 12/23/2008, Expires 6/23/2009	Pump test for test wells.

(a) Applicability of the license or permit to the project activity type, i.e., 1 = activities not requiring an COL, 2 = construction activities requiring an COL, 3 = plant operation activities.