



FLORIDA DEPARTMENT OF Environmental Protection

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Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

March 23, 2020

Sent by E-mail to:

Meghna.Pandya@fpl.com

Ms. Meghna Pandya
Environmental Specialist
Florida Power & Light Company
Environmental Services
700 Universe Blvd. (JES/JB)
Juno Beach, Florida 33408

Re: Florida Power & Light Company
Turkey Point Power Plant
NPDES Permit No. FL0001562
Use of Wood Flour for Unit 4 Condenser Tubes

Dear Ms. Pandya:

Thank you for the information that you provided in your e-mail received on March 20, 2020, regarding use of wood flour to temporarily repair leaks in the Turkey Point Unit 4 cooling water condenser tubes. The Department has reviewed the information and understands that Florida Power & Light Company (FPL) is conducting necessary temporary repairs to the Unit 4 condenser tubes to reduce in-leakage of hypersaline cooling water into the secondary side. FPL will use a maximum of 900 pounds of wood flour per day at a maximum rate of 200 pounds a minute. The wood flour shall be used until the next Turkey Point Unit 4 site wide outage (currently scheduled for October 2020). FPL will conduct more permanent repairs during the outage.

On this basis, the Department concurs that the proposed project can be considered "construction, replacement, or repair of components of an industrial site or plant," pursuant to Rule 62-620.200(26)(b), Florida Administrative Code. Moreover, repairing in-leakage or cooling water into the secondary side generally conforms to preventive maintenance BMPs required by permit under the NPDES program. Therefore, the project, as described herein, does not require a permit revision.

When discharging wood flour to the cooling canal system, FPL shall comply with the monitoring requirements in Table 1 of Attachment A. Please submit analytical results to the Department.

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If you have any questions, please contact Frank Wall or me at (850) 245-8589.

Sincerely,



Marc H. Harris, P.E.
Program Administrator
Wastewater Management Program
Division of Water Resource Management

MH/fw

Attachment

ec: Kent Edwards, Program Administrator, Southeast District, FDEP (kent.edwards@floridadep.gov)

Attachment A
Table 1 –Monitoring Requirements for Use of
Wood Flour at FPL Turkey Point Unit 4

Parameters (units)	Discharge Limitations			Monitoring Requirements		
	Monthly Average	Daily Maximum	Daily Minimum	Monitoring Frequency	Sample Type	Sample Point(s)
pH (su)	--	Report	Report	Weekly, When Applying Wood Flour	Grab	Unit 4 Cooling Water Discharge
Solids, Total Dissolved (TDS) (mg/L)	--	Report	--	Weekly, When Applying Wood Flour	Grab	Unit 4 Cooling Water Discharge
Solids, Total Suspended (TSS) (mg/L)	--	Report	--	Weekly, When Applying Wood Flour	Grab	Unit 4 Cooling Water Discharge
Turbidity (NTU)	--	Report	--	Weekly, When Applying Wood Flour	Grab	Unit 4 Cooling Water Discharge
Sodium (mg/L)	--	Report	--	Weekly, When Applying Wood Flour	Grab	Secondary Side Water System
Chlorides (mg/L)	--	Report	--	Weekly, When Applying Wood Flour	Grab	Secondary Side Water System & Unit 4 Cooling Water Discharge
Specific Conductivity(umhos)	--	Report	--	Weekly, When Applying Wood Flour	Grab	Secondary Side Water System & Unit 4 Cooling Water Discharge