



December 29, 2016

Mr. Craig Grossenbacher
Chief, Water Resource Coordination Division
Miami-Dade County Department of Regulatory and Economic Resources,
Division of Environmental Resources Management
701 NW 1st Court, 6th Floor
Miami, FL 33136-3912

RE: MDC RER letter to Matt Raffenberg dated December 21, 2016 informing FPL of approval with conditions of its September 14, 2016 Site Assessment Plan (SAP) for Ammonia.

Dear Mr. Grossenbacher,

Florida Power & Light (FPL) has reviewed MDC's December 21, 2016 letter approving FPL's Site Assessment Plan with additional sampling locations as identified on Attachment A and additional conditions. In preparing our implementation plan, several issues were identified which impact our ability to complete the site assessment report within the 60 day timeframe requested. Additionally, the estimated cost for execution of the required sampling under expedited laboratory review, necessary to potentially meet the 60-day timeline, is approximately \$400,000. In order to perform the required sampling and analysis in a timely and cost effective manner, FPL proposes the following revisions.

- Process all samples under normal lab processing timelines instead of expedited lab analyses timeframes.
- Extend the 60 day delivery date for the SAR to March 17, 2017 in order to eliminate the increased costs associated with the accelerated laboratory analysis and provide sufficient time to conduct quality assurance reviews.
- Reduce the number of vertical samples from select shallow (less than 5 feet deep during low tide) surface water sites (TPSWCCS-1, -2, -3, -7, TPBBSW-10 and TPSW-7Tt) from three to one (taken one foot from bottom) consistent with existing shallow water site sampling practices.
- Chlorophyll-a will not be analyzed for groundwater sites.
- Chlorophyll-a will be measured at low tide conditions only (tidal sites)
- Carbon Dioxide (CO₂) will be performed using field test kits instead of laboratory analysis.
- Sulfide analysis (which has been performed historically) will replace Hydrogen Sulfide analysis.

These changes should have negligible impacts to the efficacy of the SAP, as modified by DERM, while insuring a timely and complete SAR while saving our customers approximately \$100,000. Should you have any questions, please contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Matt Raffenberg".

Matthew J. Raffenberg
Senior Director, Environmental Licensing and Permitting

CC: Lee Hefty, MDC DERM
Wilbur Mayorga, MDC DERM
Barbara Brown, MDC DERM
Steve Scroggs, FPL
Alan Katz, FPL
Scott Burns, FPL