

3/24/99

Assumptions:

Units 1+2 fire total of 2,000,000 tons per year of coal

Units 1+2 Coal Sulfur = ~~0.68~~ ^{1.09} percent sulfur

Unit 4+5 fire total of 4,000,000 tons per year of coal

Units 4+5 Coal Sulfur = 0.68 percent sulfur

5% sulfur retention in ash

Bunker C sulfur content = 2.8 percent sulfur
5% Bunker C in 1, 2 briquettes 20% briquettes in coal/briquette blend

$$SO_2 \text{ emissions} = \frac{2 \times 10^6 \text{ ton coal}}{\text{year}} \times \frac{1.09 \text{ tons sulfur}}{100 \text{ ton coal}} \times \frac{2 \text{ tons } SO_2}{\text{ton sulfur}} \times \frac{.95 \text{ } SO_2 \text{ emitted}}{\text{ton } SO_2 \text{ potential}}$$

$$= 41420$$

Libby

SAH

$$\text{Sulfur content of briquettes} = 0.05(2.80) + 0.95(1.09) = 0.140 + 1.036 = 1.176$$

$$\text{Sulfur content of Coal/briquette blend} = (0.80)1.090 + 0.20(1.176) = \frac{1.10}{.87} + .2352 = 1.107$$

$$2 \times 10^6 \times 1.107 \times 2 \times .95$$

$$= 42,066$$

$$\begin{array}{r} 200 \text{ tpy} \\ 146 \text{ } \textcircled{646} \text{ tpy} \\ 200 \\ 100 \text{ tpy} \end{array}$$

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Bituminous coal	
2. Source Classification Code (SCC): 1-01-002-02	
3. SCC Units: Tons Burned	
4. Maximum Hourly Rate: 156.3	5. Maximum Annual Rate: 1,368,750
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 1.2	8. Maximum Percent Ash: 9
9. Million Btu per SCC Unit: 24	
10. Segment Comment (limit to 200 characters): 1. Heat content based on 12,000 Btu/lb. 2. Maximum sulfur content based on SO2 emission limit of 2.1 lb/MMBtu; Condition of Certification for Units 4 and 5	

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Bituminous coal	
2. Source Classification Code (SCC): 1-01-002-02	
3. SCC Units: Tons burned	
4. Maximum Hourly Rate: 199.8	5. Maximum Annual Rate: 1,750,200
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 1.2	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 24	
10. Segment Comment (limit to 200 characters): 1. Heat content based on 12,000 Btu/lb. 2. Maximum sulfur content based on SO2 emission limit of 2.1 lb/MMBtu; Condition of Certification for Units 4 and 5	

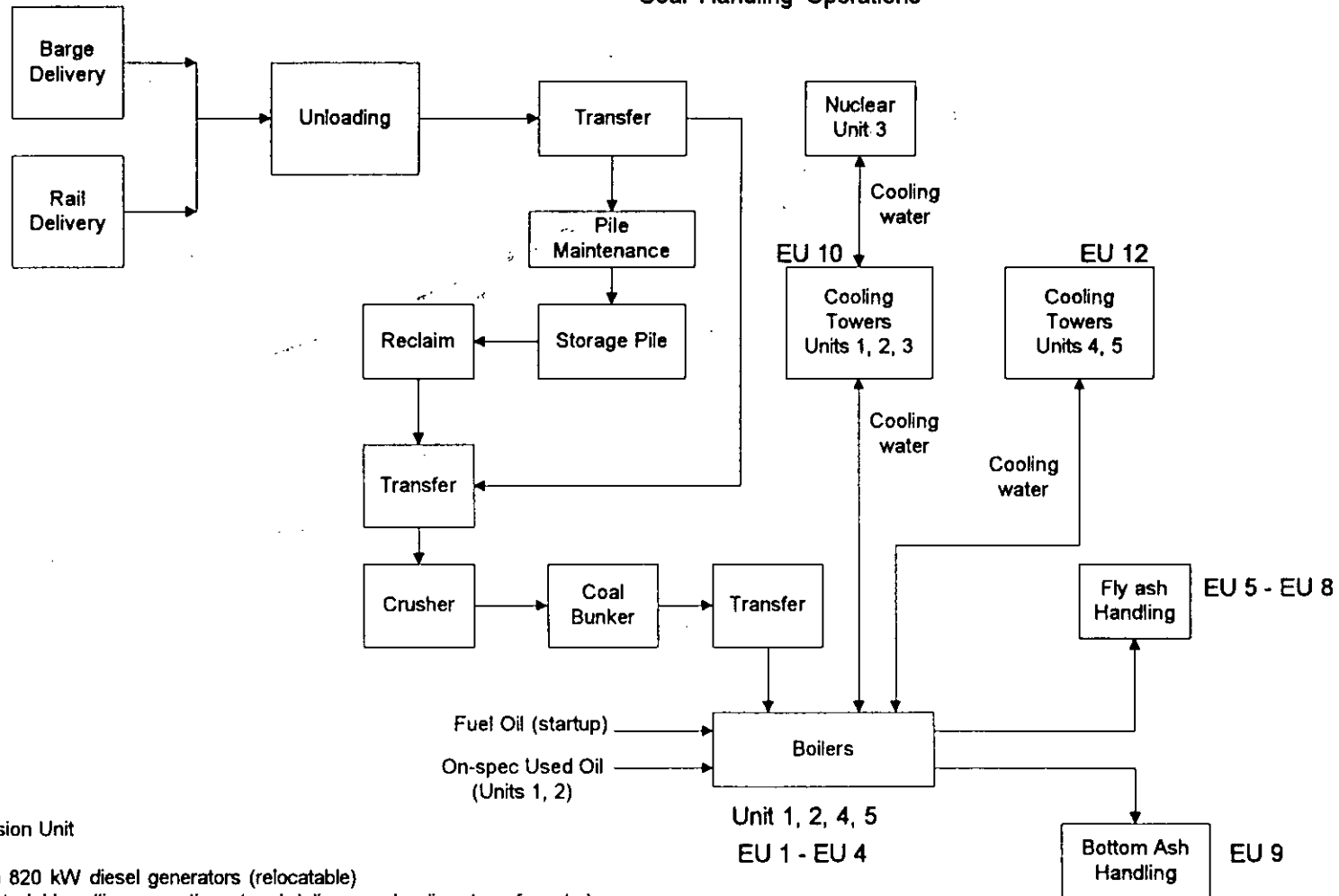
Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Bituminous coal	
2. Source Classification Code (SCC): 1-01-002-02	
3. SCC Units: Tons Burned	
4. Maximum Hourly Rate: 277.7	5. Maximum Annual Rate: 2,432,725
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 0.7	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 24	
10. Segment Comment (limit to 200 characters): 1. Heat content based on 12,000 Btu/lb. 2. Maximum sulfur content based on SO2 emission limit of 1.2 lb/MMBtu; Condition of Certification for Units 4 and 5	

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Bituminous coal	
2. Source Classification Code (SCC): 10100202	
3. SCC Units: Tons burned	
4. Maximum Hourly Rate: 277.7	5. Maximum Annual Rate: 2,433,725
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 0.7	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 24	
10. Segment Comment (limit to 200 characters): 1. Heat content based on 12,000 Btu/lb. 2. Maximum sulfur content based on SO2 emission limit of 1.2 lb/MMBtu; Condition of Certification for Units 4 and 5	

Simplified Diagram Coal Handling Operations



Note:

EU = Emission Unit

EU 11 - (3) 820 kW diesel generators (relocatable)

EU 13 - Material handling operations (coal delivery, unloading, transfer, etc.)

EU 14 - Facility-wide Fugitive Deminimis Emissions (not shown)

See segment section for operating rate of each emission unit.

Attachment
Facility Process Flow Diagram
Florida Power Corporation
Crystal River, FL

Process Flow Legend:
Solid / Liquid ———→
Gas - - - - -→
Steam ······→

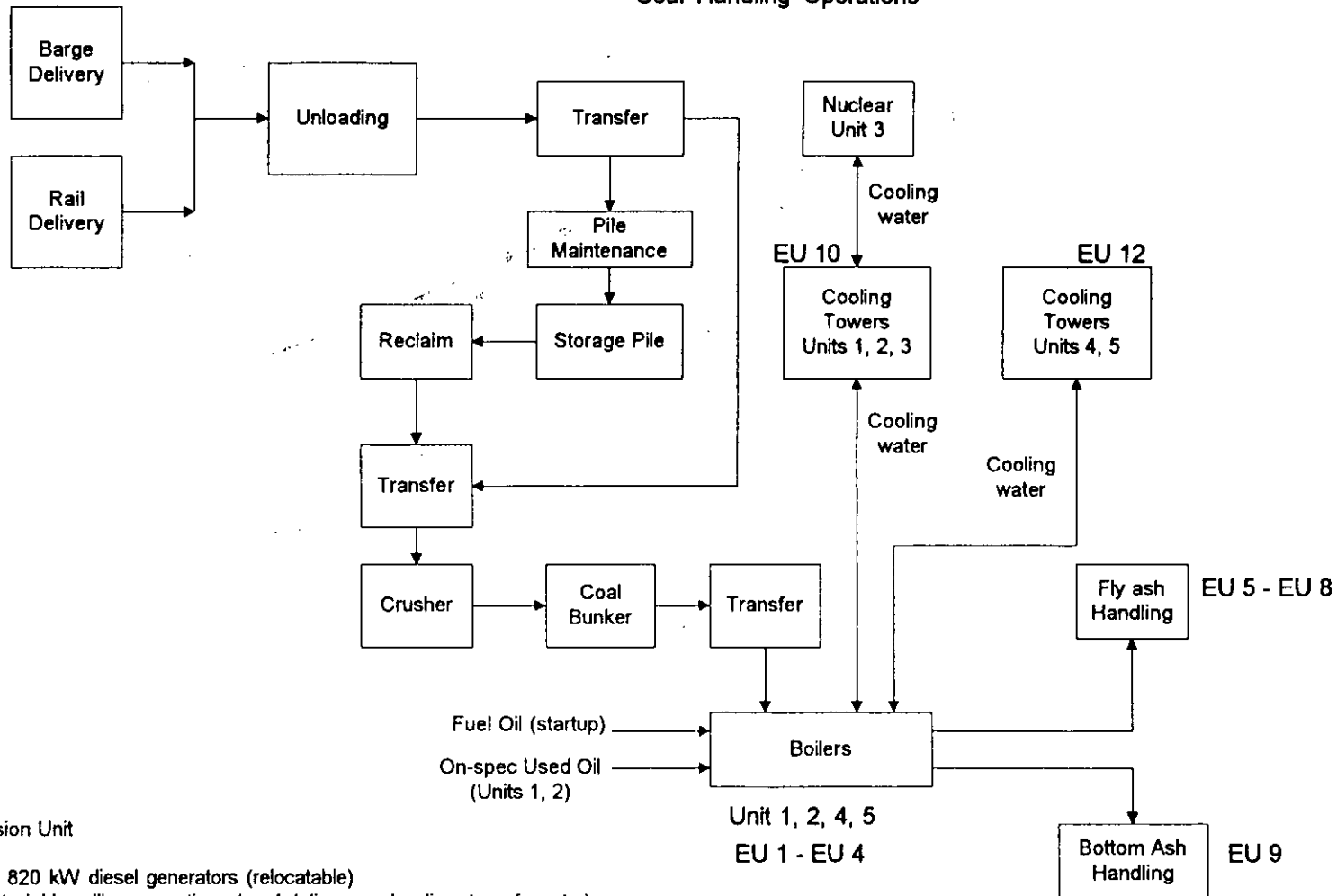
Emission Unit: Boiler Unit 1, 2, 3, and 4
Process Area:
Filename: FPCCR2E.VSD
Latest Revision Date: 6/5/96



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Simplified Diagram Coal Handling Operations



Note:

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Emission Unit: Boiler Unit 1, 2, 3, and 4
Process Area:
Filename: FPCCR2E.VSD
Latest Revision Date: 6/5/96



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Applied Sciences, Inc.

drums where it is coked by its own contained heat. The process requires several drums to permit removal of the coke in one drum while the others remain on stream. The residual product which solidifies in these drums is termed *delayed coke*. When first removed from the drum, it has the appearance of run-of-mine coal, except that the coke is dull black.

The analysis of the coke varies with the crude from which it is made, ranging as follows:

Moisture	3-12%
Volatile matter	10-20%
Fixed carbon	71-88%
Ash	0.2-3.0%
Sulfur	2.9-5.4%
Btu/lb, dry	14,100-15,600 (32.8 to 36.3 MJ/kg)

FLUID COKING

Two large vessels are used in fluid coking. One is known as a reactor vessel, and the other, a burner vessel. In this process, fluid coke is both the catalyst and secondary product. The seed coke is first heated in the burner vessel, either by adding air and burning a portion of the coke, or by burning an extraneous fuel such as oil. The heated seed coke then flows into the reactor vessel where it comes in contact with the preheated residual oil and the lighter fractions of the oil are flashed off. The coke which is produced both deposits in uniform layers on the seed coke and forms new seed coke. Thus there is a constantly accumulating coke reservoir which is tapped off and is available as a boiler feed.

The coke thus formed is a hard, dry, spherical solid resembling black sand. It is composed of over 90-percent carbon with varying percentages of sulfur and ash, depending on the source of the crude oil. Typical analyses are

Fixed carbon	90-95%
Volatile matter	3-6.5%
Ash	0.2-0.5%
Sulfur	4.0-7.5%
HHV, Btu/lb, dry	14,100-14,600 (32.8 to 34.0 MJ/kg)

COAL TAR

Coal tar is a byproduct in the carbonization of coal. The tar compounds are extremely complex and number in the hundreds. The solid material which is insoluble in benzene is contained as colloidal and coarse dispersed particles and is known as "free carbon." The composition of the tar is dependent on the temperature of carbonization and, to a lesser extent, on the nature of the coking coal. The following is an example of a coal tar analysis.

Carbon	89.9%
Hydrogen	6.0%
Sulfur	1.2%
Oxygen	1.8%
Nitrogen	0.4%
Moisture	0.7%
Gravity, Baumé	1.18 °
Viscosity at 122°F, SSF	900
Flash point	156°F (69°C)
Heating Value, Btu/lb, dry	16,750 (39.0 MJ/kg)

Coal tar is burned in boilers only when it cannot be sold for other purposes at a higher price than its equivalent fuel value. At ordinary temperature, the viscosity of tar is very high and must be heated for pumping. It burns like a fuel oil and the same equipment can be used.

COAL TAR PITCH

Coal tar pitch is used to a small extent for generation of steam. It is the residue resulting from the distillation and refining of coal tar. The pitch is solid at ordinary atmospheric temperature but becomes liquid at about 300°F. Generally, it is burned in pulverized form; in a few cases, it is melted and burned like oil or coal tar. When it is burned in pulverized form, it must be kept cool during pulverization and during delivery to the furnace. In some cases, it is preferred to coal. Because of its very low ash content, the stack gas is practically free from dust, and therefore there is no flue dust nuisance. When burned in liquid form, it must be kept very hot to prevent congealing. Table VIII shows analyses of coal tar pitch.

Table VII. Analyses of Typical Cokes, as Fired

Kind	% Proximate Analysis					% Ultimate Analysis					HHV, Btu/Lb	A at Zero Excess Air, Lb/10 ⁶ Btu
	H ₂ O	VM	FC	ASH	H ₂ O	C	H ₂	S	O ₂	N ₂		
High-temperature coke	5.0	1.3	83.7	10.0	5.0	82.0	0.5	0.8	0.7	10.0	12,200	798
Low-temperature coke	2.8	15.1	72.1	10.0	2.8	74.5	3.2	1.8	6.1	10.0	12,600	763
Beehive coke	0.5	1.8	86.0	11.7	0.5	84.4	0.7	1.0	0.5	11.7	12,527	807
Byproduct coke	0.8	1.4	87.1	10.7	0.8	85.0	0.7	1.0	0.5	10.7	12,690	802
High-temperature coke breeze	12.0	4.2	65.8	18.0	12.0	66.8	1.2	0.6	0.5	18.0	10,200	805
Gas Works Coke:												
Horizontal retorts	0.8	1.4	88.0	9.8	0.8	86.8	0.6	0.7	0.2	9.8	12,820	808
Vertical retorts	1.3	2.5	86.3	9.9	1.3	85.4	1.0	0.7	0.3	9.9	12,770	809
Narrow coke ovens	0.7	2.0	85.3	12.0	0.7	84.6	0.5	0.7	0.3	12.0	12,550	802

WOOD

Wood is a complex vegetable tissue composed principally of cellulose, an organic compound having a definite chemical composition. It would, therefore, seem reasonable to assume that equal weights of different dry wood species will have practically the same heat content. However, owing to the presence of resins, gums and other substances in varying amounts, heat content is not uniform.

Ultimate analyses showing the chemical composition of several different wood species are given in Table IX. Because the substances making up these fuels are complex organic chemical compounds, and complex thermodynamic changes take place when they are burned in a furnace, it is not possible to make use of formulas such as the Dulong type to predict their heating values. These analyses do not indicate the amount of resins or similar substances present. But note that the heat content, on the dry basis, is greatest in the cases of highly resinous woods as fir and pine.

The moisture content of freshly cut wood varies from 30 to 50 percent. After air drying for approximately a year, this is reduced to between 18 and 25 percent.

Table VIII. Coal Tar Pitch

Proximate Analysis	
Moisture	2.2%
VM	48.2%
FC	48.9%
Ash	0.7%
Ultimate Analysis	
Carbon	90.1%
Hydrogen	4.9%
Sulfur	0.9%
Oxygen	0.6%
Nitrogen	0.6%
Moisture	2.2%
Ash	0.7%
HHV, dry	16,200 (37.7 MJ/kg)

Most wood as commercially available for steam generation is usually the waste product resulting from some manufacturing process. Its moisture content as received at the furnace will depend on (1) extraneous water from source or storage or handling in the rain and (2) whether it is "sap wood" or "heart wood," as well as on the species and on the time of year it is cut.

Table XV. Detailed Requirements for Fuel Oils^A

Grade of Fuel Oil	Flash Point, °C (°F)	Pour Point, °C (°F)	Water and Sedi- ment Vol %	Carbon Residue on 10 % Bottoms %	Ash Weight %	Distillation Temp. C (°F)		
	Min	Max	Max	Max	Max	10% Point	90% Point	Max
No. 1 Distillate oil intended for vaporizing pot-type burners and other burners requiring this grade	38 or legal (100)	-18 ^C (0)	0.05	0.15	...	215 (420)	...	288 (550)
No. 2 Distillate oil for general purpose heating for use in burners not requiring No. 1	38 or legal (100)	-6 ^C (20)	0.05	0.35	282 ^C (540)	338 (640)
No. 4 Preheating not usually required for handling or burning	55 or legal (130)	-6 ^C (20)	0.50	...	0.10
No. 5 (Light) Preheating may be required depending on climate and equipment	55 or legal (130)	...	1.00	...	0.10
No. 5 (Heavy) Preheating may be required for burning and, in cold climates, may be required for handling	55 or legal (130)	...	1.00	...	0.10
No. 6 Preheating required for burning and handling	60 (140)	^G	2.00 ^E

^A It is the intent of these classifications that failure to meet any requirement of a given grade does not automatically place an oil in the next lower grade unless in fact it meets all requirements of the lower grade.

^B In countries outside the United States other sulfur limits may apply.

^C Lower or higher pour points may be specified whenever required by conditions of storage or use. When pour point less than -18°C (0°F) is specified, the minimum viscosity for Grade No. 2 shall be 1.8 cSt (32.0 SUS) and the minimum 90 % point shall be waived.

^D Viscosity values in parentheses are for information only and not necessarily limiting.

^E The amount of water by distillation plus the sediment by extraction shall not exceed 2.00 %. The amount of sediment by extraction shall not exceed 0.50 %. A deduction in quantity shall be made for all water and sediment in excess of 1.0 %.

^F Where low sulfur fuel is required, fuel oil falling in the viscosity range of a lower numbered grade down to and including No. 4 may be supplied by agreement between purchaser and supplier. The viscosity range of the initial shipment shall be identified and advance notice shall be required when changing from one viscosity range to another. This notice shall be in sufficient time to permit the user to make the necessary adjustments.

^G Where low sulfur fuel oil is required, Grade 6 fuel oil will be classified as low pour -15°C (60°F) max or high pour (no max.) Low pour fuel oil should be used unless all tanks and lines are heated.

Excerpted from ASTM Standards D 396, Specifications for Fuel Oils.

Table XV. Detailed Requirements for Fuel Oils^A — Continued

Saybolt Viscosity, s ^D				Kinematic Viscosity, cSt ^D				Specific Gravity 60/60°F (deg API)	Copper Strip Cor- rosion	Sul- fur, %
Universal at 38°C (100°F)		Furol at 50°C (122°F)		At 38°C (100°F)		At 50°C (122°F)				
Min	Max	Min	Max	Min	Max	Min	Max	Max	Max	Max
...	1.4	2.2	0.8499 (35 min)	No. 3	0.5 or legal
(32.6)	(37.9)	2.0 ^C	3.6	0.8762 (30 min)	No. 3	0.5 ^B or legal
(45)	(125)	5.8	26.4 ^F	legal
(>125)	(300)	>26.4	65 ^F	legal
(>300)	(900)	(23)	(40)	>65	194 ^F	(42)	(81)	legal
(>900)	(9000)	(>45)	(300)	>92	638 ^F	50°C	(122°F)	legal

tion and cracking, such fuels as gasoline, kerosene, gas oil, light fuel oils, lubricating oil, heavy fuel oil, residual tar, pitch and petroleum coke are produced.

PROPERTIES OF FUEL OIL

The term *fuel oil* may conveniently cover a wide range of petroleum products. It may be applied to crude petroleum, to a light petroleum fraction similar to kerosene or gas oil, or to a heavy residue left after distilling off the fixed gases, the gasoline, and more or less of the kerosene and gas oil. To provide stan-

dardization, specifications have been established, Table XV, for several grades of fuel oil.

Sometimes designated as light and medium domestic fuel oils, Grades No. 1 and No. 2 are specified mainly by the temperature of the distillation range. Grade No. 6, designated as heavy industrial fuel oil and sometimes known as Bunker C oil, is specified mainly by viscosity. The specific gravities of Grades 4, 5, and 6 are not specified because they will vary with the source of the crude petroleum and the extent of the refinery operation in cracking and distilling.

API, density in lb per gal, Btu per lb, and Btu per gal for petroleum products is graphically shown in Fig. 10. Also included are the ranges in deg API for gasoline, kerosene, gas oil and fuel oils. Knowing the value of any one of these characteristics, it is possible to determine all the others quickly. For example, assume the deg API to be 75, then the intersection of this value with the deg API curves is at a point A, through which a horizontal line is drawn to intersect the remaining curves. Then, by referring to their respective scales, it is possible to read the specific gravity B as 0.685, the density C as 5.675 lb per gal, and the higher heating value at D as 20,550 Btu per lb, or at E as 116,800 Btu per gal. Of particular interest is the fact that, although the high specific gravity fuel oils (15°API) have a lower heating value per pound than the lower specific gravity gasoline (60°API), the total heat per gallon, the basis on

which they are purchased commercially, is considerably greater.

FLASH AND FIRE POINT

Flash point of fuel oil is the lowest temperature at which sufficient vapor is given off to

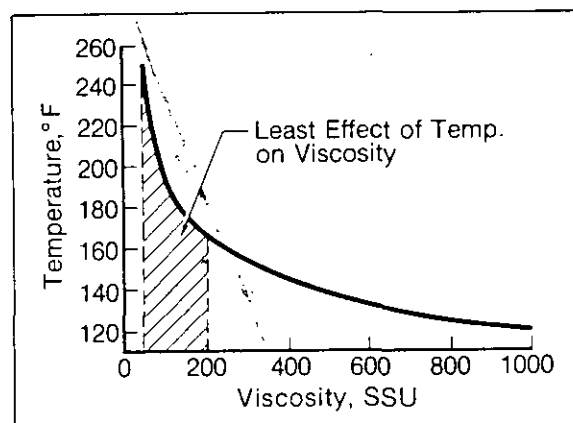


Fig. 8 Viscosity versus temperature, No. 6 fuel oil

Table XVI. Typical Analyses and Properties of Fuel Oils*

Grade	No. 1 Fuel Oil	No. 2 Fuel Oil	No. 4 Fuel Oil	No. 5 Fuel Oil	No. 6 Fuel Oil
Type	Distillate (Kerosene)	Distillate	Very Light Residual	Light Residual	Residual
Color	Light	Amber	Black	Black	Black
API gravity, 60°F	40	32	21	17	12
Specific gravity, 60/60°F	0.8251	0.8654	0.9279	0.9529	0.9861
Lb/U.S. gallon, 60°F	6.870	7.206	7.727	7.935	8.212
Viscos., Centistokes, 100°F	1.6	2.68	15.0	50.0	360.0
Viscos., Saybolt Univ., 100°F	31	35	77	232	...
Viscos., Saybolt Furol, 122°F	170
Pour point, °F	Below zero	Below zero	10	30	65
Temp. for pumping, °F	Atmospheric	Atmospheric	15 min.	35 min.	100
Temp. for atomizing, °F	Atmospheric	Atmospheric	25 min.	130	200
Carbon residue, %	Trace	Trace	2.5	5.0	12.0
Sulfur, %	0.1	0.4-0.7	0.4-1.5	2.0 max.	2.8 max.
Oxygen and nitrogen, %	0.2	0.2	0.48	0.70	0.92
Hydrogen, %	13.2	12.7	11.9	11.7	10.5
Carbon, %	86.5	86.4	86.10	85.55	85.70
Sediment and water, %	Trace	Trace	0.5 max.	1.0 max.	2.0 max.
Ash, %	Trace	Trace	0.02	0.05	0.08
Btu/gallon	137,000	141,000	146,000	148,000	150,000

* Courtesy Exxon Corporation



RECEIVED

MAR 24 1999

BUREAU OF
AIR REGULATION

March 22, 1999

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Coal "Briquettes" Fuel

0170004-006-AC
P50-F1-007

As we discussed in Tallahassee last week, I have enclosed a P.E. seal and application processing fee check for the "coal briquettes" permit application for the Florida Power Corporation (FPC) Crystal River plant. For your convenience, there are two originals of the P.E. seal page enclosed.

Thank you for your prompt processing of this request. Please contact me at (727) 826-4334 if you have any questions.

Sincerely,

J. Michael Kennedy, Q.E.P.
Manager, Air Programs

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [✓] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

Date

(seal)

FL PE# 50474

* Attach any exception to certification statement.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [☒] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

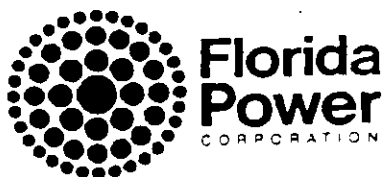
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Kent D. Hedrick 3/23/99
Signature Date

Kent D. Hedrick

FL PE #50474

* Attach any exception to certification statement.



February 22, 1999

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Coal "Briquettes" Fuel

As you know from previous correspondence, Florida Power Corporation (FPC) has been approached by its fuel supplier, Electric Fuels Corporation, concerning the possibility of burning "coal briquettes" at its Crystal River plant. The briquettes are produced from coal fines at the mines that currently supply the coal for Crystal River Units 1, 2, 4, and 5. Coal fines are combined under heat and pressure with a small amount of oil (maximum of 5% Bunker C oil) at the mine. The oil is the binding agent for the coal fines. Subjecting the coal fines to heat and pressure removes moisture and produces the coal briquettes, which are small chunks of coal that can be handled and burned with the regular coal supply.

The following table shows the average sulfur content of the coal supplies burned in Units 1 and 2, and in Units 4 and 5. The averages are based on daily coal samples averaged over the calendar year and have been reported in the Annual Operating Reports for these units.

	1996	1997	1998	Average
Units 1 and 2	1.03%	1.07%	1.05%	1.05%
Units 4 and 5	0.68%	0.67%	0.69%	0.68%

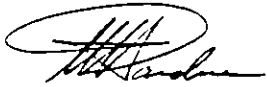
FPC would receive the briquettes in shipments blended with some of the regular coal supply. In order to ensure that the addition of coal briquettes does not result in an increase in emissions due to the sulfur content of the Bunker C oil, FPC is willing to commit to limiting the sulfur content of these shipments. The sulfur content, as averaged on an annual basis, of the shipments of briquettes combined with coal, will not exceed 1.05% for Units 1 and 2, and will not exceed 0.68% for Units 4 and 5.

Mr. Al Linero
February 22, 1999
Page Two

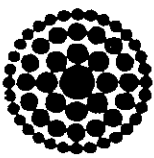
Use of the briquettes as fuel is an environmentally beneficial way of utilizing the coal fines resulting from the mining process. If not used as fuel, the fines would otherwise be discarded. Limiting the sulfur content of the fuel to historical levels ensures that no emissions increase will result.

FPC requests that the DEP add "coal briquettes" to the list of fuels authorized to be burned in units 1, 2, 4, and 5, subject to the sulfur content limitation. This limit would apply to the annual average sulfur content of the shipments received of briquettes combined with coal. Please contact Mike Kennedy at (727) 826-4334 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", enclosed within a hand-drawn oval.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services
FPC Responsible Official



**Florida
Power**
CORPORATION

ACCOUNTS PAYABLE DEPT. CX1K

P. O. BOX 14042

ST. PETERSBURG, FL 33733-4042 REMITTANCE ADVICE

(727) 820-5257

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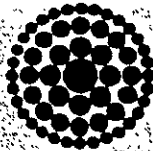
CHECK DATE 03/17/1999 VENDOR FLA DEPT OF ENVIRONMENTAL

VENDOR NO. 278473 CHECK NO. 2048363

INVOICE NO.	DATE	OUR ORDER NO.	VOUCHER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
CK127745	03/12/99		9903161352	250.00	.00 TOTAL	250.00 250.00

THE ATTACHED REMITTANCE IS IN FULL SETTLEMENT OF ACCOUNT AS STATED. IF NOT CORRECT PLEASE RETURN TO ABOVE ADDRESS.

Accounts Payable Department CX1K
P.O. Box 14042
St. Petersburg, FL 33733-4042



**Florida
Power**
CORPORATION

DATE 03/17/1999 CHECK NO. 2048363

PAY:

\$250 DOLLARS AND 00 CENTS

\$*****250.00

SunTrust / Mid-Florida

TO
THE
ORDER
OF

FLA DEPT OF ENVIRONMENTAL
PROTECTION
2600 BLAIR STONE RD
TALLAHASSEE

FL 32399-2400

Janet A. Janni
Treasurer

Void after 60 days

1002048363 06310115316990032052736



RECEIVED

MAR 17 1999

BUREAU OF
AIR REGULATION

March 15, 1999

Mr. Clair Fancy, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: Petroleum Coke Permitting

As you know, a final construction permit authorizing a blend of coal and petroleum coke to be burned in Florida Power Corporation's (FPC) Crystal River Units 1 and 2 was issued by the DEP on January 11, 1999. FPC requests that the conditions authorizing use of the blended fuel be incorporated into the Title V permit for these units.

In addition, the DEP is currently reviewing FPC's submittal to allow use of "coal briquettes" in Crystal River Units 1, 2, 4, and 5. FPC understands that approval is forthcoming, pending receipt of a \$250 processing fee. Therefore, FPC also requests that the Title V permit also reflect this approval at the appropriate time.

Thank you for your consideration of these requests. Please contact Mike Kennedy at (727) 826-4334 if you have any questions.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director