



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.

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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 large, loopy oval shape.

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