



**Florida
Power**
CORPORATION

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Division of
Environmental Programs

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SOUTH WEST DISTRICT OF ENFORCEMENT
ST. PETERSBURG 33703

Mr. Paul J. Traina, Director
Enforcement Division
United States Environmental Protection Agency
Region IV
1421 Peachtree Street, N.E.
Atlanta, Georgia 30309

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FEB 3 1976

Re: Application for Compliance Date Extension
for Crystal River Units 1 and 2

Dear Mr. Traina:

Your letter of January 13, 1976 was received on January 15th. The information contained herein is predicated on the assumptions that EPA will approve the revised Florida SO₂ emission limitation applicable to the Crystal River plant and your approval of our coal supply contract which is scheduled for submittal by June 30, 1976. The numbered responses follow the numbers in your letter of January 13th.

1. Description of control devices for reducing particulate emissions:

The existing electro-static precipitator on Unit 2 is Buell two-field precipitator designed to operate at an efficiency of 98% burning 11,700 BTU coal with a 9.8% moisture and 10% ash. The precipitator will be renovated and upgraded by adding an additional field. After the renovation, it is expected to operate at an efficiency which will meet the particulate emission limitation.

The existing mechanical dust collector installed on Unit 1 will be removed. An electro-static precipitator designed to meet the State and Federal emission standards will be installed.

2. Time schedule for installing particulate control equipment:

An engineering contract has been awarded to Black and Veatch to perform the necessary engineering for the entire coal conversion project. They are presently working on preparing the necessary design, specification and bid documents for the project. Preliminary information

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indicates that the precipitators can be designed, fabricated, constructed and tied into the units in time to meet the scheduled final compliance dates.

3. Scheduled outage times:

It is anticipated that the unit outage time required for each unit will be three months. This outage time is dictated by the necessary major boiler modifications, the installation of the ash handling systems and the electro-static precipitator installations. The present planned outage times for the conversion are:

Unit 2 March 30, 1978 through June 30, 1978

Unit 1 December 31, 1978 through March 31, 1979

4. Long lead items:

The following is a schedule covering the long-lead items associated with the coal conversion:

<u>Description</u>	<u>Engineering Procurement and Delivery</u>	<u>Begin Construction</u>
Unit 2 - ash handling system	22 mos.	3/78
Unit 1 - electro-static precipitator	25 mos.	3/78
Unit 1 - ash handling system	22 mos.	3/78

Contract dates on these items cannot be scheduled until our receipt of your approval of the coal supply contract.

In our November 24, 1975 letter we indicated that both units would be in compliance with the air pollution requirements in effect on November 24, 1975 and as stated in EPA's letter of November 4, 1975. Unit 2 will be converted by June 30, 1978 and certified for compliance within 90 days of start-up. Unit 1 will be converted by March 31, 1979 and certified for compliance within 90 days of start-up. Because Unit No. 1 will be shut down by December 31, 1978, it will, therefore, be in compliance with all emission limitations.

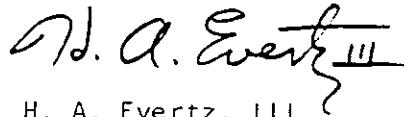
Mr. Paul J. Traina, Director

-3-

January 30, 1976

The Company has instructed its Consulting Engineer to study the feasibility of expediting the conversion of Crystal River No. 2 to burning coal in advance of the June, 1978 date set forth above. We will keep you advised as this study progresses.

Very truly yours,



H. A. Evertz, III
Corporate Counsel

HAE:gc

cc: Messrs. Jack E. Ravan, EPA
Randy Mayfield, EPA
G. T. Helms, EPA
Ray Cunningham, EPA
J. W. Landers, FDER
David G. Wilson, FEA
Warren Zurn, FEA
Ms. Judith M. Liersch, FEA

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