



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard

Atlanta, Georgia 30345

November 20, 1996

RECEIVED

NOV 26 1996

BUREAU OF
AIR REGULATION

Mr. Clair Fancy
Chief, Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

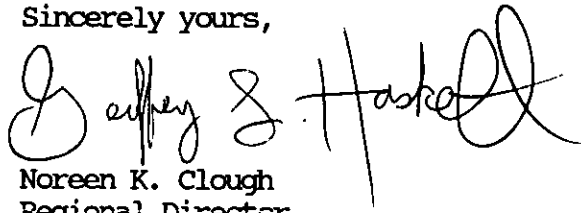
We understand that Florida Power Corporation (FPC) has filed a Petition for a Formal Administrative Hearing as a result of your Department's Intent to Deny a permit to burn a blend of petroleum coke and coal at Crystal River Units 1 and 2 in Citrus, Florida. As you know, we commented on the proposed permit on February 7, 1996. At that time, we requested that FPC provide information to support their contention that New Source Review was not applicable to this project. Also, because of the magnitude of the proposed emissions increase (9,357 tons sulfur dioxide per year), we asked that FPC be required to assess potential impacts from this project and all sources in the area to Chassahowitzka Wilderness Area, a Class I area, 21 km south of the Crystal River facility. We asked that FPC evaluate impacts to all Class I air quality related values (AQRV), including lichens and visibility.

We support your June 25, 1996, Intent to Deny the permit. Based on the information we have been provided, FPC does not qualify for an exemption from PSD review. In addition, FPC has not demonstrated that AQRVs at the Class I area will not be adversely affected by the emissions increase. Chassahowitzka already experiences visibility impairment, as do all areas in the Eastern U.S.; most of this visibility impairment is due to fine particles, especially sulfates. The large SO₂ emissions increase proposed by FPC would exacerbate the existing impairment by significantly increasing sulfate concentrations in the air. This would be in direct opposition to the national goal established by Congress in Section 169A of the 1977 Clean Air Act Amendments: "...the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory class I Federal areas which impairment results from manmade air pollution." Section 169A also states that "...each major source...which...emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of

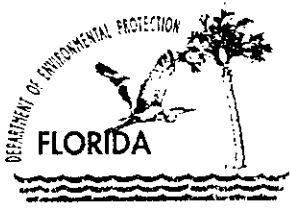
visibility in any such area, shall procure, install, and operate, as expeditiously as practicable...the best available retrofit technology... for the purpose of eliminating or reducing any such impairment...." We believe that this section may be applicable to the Crystal River facility, particularly if FPC proceeds with this project.

If you have questions, please call Ellen Porter of our Air Quality Branch in Denver at 303/969-2617.

Sincerely yours,


Noreen K. Clough
Regional Director

cc: C. Holladay, BAR
E. Svec, BAR
D. Reason, OGC
B. Thomas, SWD
M. Kennedy, FPC
J. Alves, HGSS



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 13, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. Michael Kennedy
Manager Air Programs
Environmental Services Department
Florida Power Corporation
3201 Thirty-fourth Street, South
St. Petersburg, Florida 33711

Re: Meeting to Discuss Crystal River Plant Units 1 and 2, Petcoke Project

Dear Mr. Kennedy:

I received your phone messages of November 12 and 13, suggesting that we meet and include attorneys on November 20. I suggested meeting this week since one of the key people, Mr. Clair Fancy, is out the entire week of November 18. My assistant, Ms. Tober, will call to set a date and time at everyone's earliest convenience. If you wish, you can call her and provide some alternative suggestions in order to schedule the meeting.

If you have any questions, please call me or Ms. Tober at (904)488-1344.

Sincerely,

A. A. Linero, P.E., Administrator
New Source Review Section

AAL/aal/l

cc: To addressee by FAX

Fold at line over top of envelope to the right of the return address

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3. Article Addressed to:
 Mr. Michael Kennedy
 Fla. Power Corp
 3201 34th Street, South
 St. Pete, FL 33711

4a. Article Number
 P 339 251 178

4b. Service Type
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5. Signature (Addressee)
 Michael Kennedy

6. Signature (Agent)

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PS Form 3811, December 1991 *U.S. GPO: 1993-352-714

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