Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

December 14, 2001

Mr. Jamie Hunter, Environmental Specialist
Florida Power Company
Environmental Services Section, MAC BB1A
P.O. Box 14042
St. Petersburg, Florida 33733-4042

Re: Use Of Product CLC-3 As A Coal Dust Suppressant
Crystal River Plant, Facility ID #: 0170004

Dear Mr. Hunter:

We have reviewed your request (dated October 16, 2001) and additional information (received November 19, 2001) to use Product CLC-3 (Chemical Change Agent/Dust Suppressant) on your coal as a means of suppressing fugitive dust.

It has been determined that the use of this material has the potential to increase emissions of regulated air pollutants. From the information provided, we do not have the required reasonable assurance that a significant increase in emissions above your current actual emission levels will not occur. Any increases in actual emissions resulting from a change in a federally enforceable method of operation is defined as a modification. In order to authorize the use of this synthetic fuel, the magnitude of the increase in actual emissions as a result of the change needs to be reviewed for PSD applicability. If you wish to conduct a test burn using this material (for a specified period of time) that will demonstrate actual emissions before and after the addition of the tall oil pitch, the PSD determination can be temporarily postponed through the issuance of a construction permit authorizing the test burn. If the tests demonstrate that there is not a significant increase in emissions of any regulated air pollutant, then the operation permit will need to be revised to include this new method of operation. However, if the tests indicate that there is a significant increase in emissions of any regulated air pollutant, then an application for a PSD New Source Review, including a Best Available Control Technology (BACT) determination, pursuant to Rule 62-212.400(5), F.A.C., must be made in order to obtain authorization to continue using the new synthetic fuel.

Should you have any questions regarding this response, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letterhead address.

Sincerely,

Scott M. Sheplak, P.E.
Title V Section Administrator
Bureau of Air Regulation

12/17/01 cc: Jonathan Holtom
Mailed on 12/17/01

SMS/jh

cc: Ms. Jennifer Stenger, P.E., FPC
Mr. Buck Oven, P.E., DEP
Mr. Jerry Kissel, P.E., DEP-SWD

MATERIAL SAFETY DATA SHEET

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Identification

Product Name:	Chemical Change Agent
Product Number:	CLC-3
Synonyms:	CCA, Emulsion, Synfuel
CAS Number:	Blend

Company Identification

Ceredo Liquid Terminal Inc.
Post Office Box 308
Ceredo, West Virginia 25507 USA
304/526-0700 (For product information or emergencies)
727/824-6684 (For product information or emergencies)

2. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	Amount	CAS Number
Tall Oil Pitch	0-55%	8016-81-7
Water	45-65%	7732-18-5
Tall Oil	0-25%	N/A
Nonionic surfactant	<4%	127087-87-0
Anionic Emulsifier	<4%	N/A
Sodium Hydroxide	<0.5%	1310-73-2
FFA (C16-C18)	0-10%	67701-03-5

COMPOSITION COMMENT:

Coal Chemical Change Agent CLC-3 is a proprietary emulsified mixture of tall oil pitch, crude tall oil, fatty acids, water, and emulsifier. The emulsion should remain in suspension for a minimum of 7 days after emulsification.

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

The health hazards of this product should be low under normal industrial and commercial uses. The product is a golden brown liquid with a smoky odor. Eye and skin protection is recommended for handling the product. Inhalation or ingestion can cause irritation to the nose, throat and lungs or, in extreme cases, vomiting and diarrhea. Wash thoroughly after handling the product.

POTENTIAL HEALTH EFFECTS

EYE:
May cause eye irritation. Heated product may cause thermal burns. Eyes should be flushed with water for 15 minutes. Seek medical attention.

SKIN:
Skin irritation may be caused after prolonged exposure, or from possible allergic reaction. Contact with product at elevated temperatures can result in thermal burns.

INHALATION:
No hazards are expected in normal industrial use under normal temperatures and ventilation. Inhalation of toxic fumes, vapor, or mists generated at high temperatures may cause irritation to the nose, throat, and respiratory tract or other harmful effects.

INGESTION:
Do not ingest. Small amounts swallowed during normal handling operations are not likely to cause harmful effects. Aspiration of swallowed liquid may cause lung damage. Consult a doctor immediately if large quantities are ingested.

SIGNS AND SYMPTOMS OF EXPOSURE:
Possible irritation to eyes, skin, nose, or respiratory tract as noted above.

Chronic Effects:
Not listed as cancer hazard under NTP, IARC, or OSHA.

4. FIRST AID MEASURES

EYE CONTACT FIRST AID:
Flush eyes with large amount of water for at least 15 minutes. Get medical attention if irritation persists.

SKIN CONTACT FIRST AID:
Wash skin with soap and water. Use of waterless hand cleaner will help in removing product from skin.

INHALATION FIRST AID:
If exposed to excessive levels of fumes, remove to fresh air and get medical attention if cough or other symptoms develop.

INGESTION FIRST AID:
Do not induce vomiting. No treatment is necessary unless large quantities are ingested, however, get medical advice.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES
Emulsified product contains a large amount of water and is not anticipated to ignite unless water is driven off by heat.

COC Flash Point: >475 Deg. F. for dewatered product
Auto ignition Temperature: N/A

FLAMMABLE LIMITS IN AIR
LEL: N/A
UEL: N/A

EXTINGUISHING MEDIA:
Use Alcohol foam, Carbon Dioxide, water fog, dry chemical, or halon to fight fires with this material.

FIRE & EXPLOSION HAZARDS:
During a fire, irritating and toxic combustion gases may be generated by thermal decomposition of the product.

FIRE FIGHTING INSTRUCTIONS
Avoid breathing smoke, fumes, and decomposition products.

In confined spaces, wear self-contained breathing apparatus pressure-demand MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES

INITIAL CONTAINMENT:
Treat or dispose of waste material in accordance with all local, state/provincial, and national requirements. Dike area and reclaim material if possible.

SMALL SPILLS PROCEDURE:
Absorb material with sand, vermiculite, or other noncombustible absorbent material. Wash area with soap and water. Treat or dispose of waste material in accordance with all local, state, and national requirements.

7. HANDLING AND STORAGE

HANDLING (PERSONNEL):
Wash after handling. Avoid prolonged contact with skin or eyes. Avoid breathing vapors, dust, mists, gases from heated material. Use care in handling/storage.

HANDLING (PHYSICAL ASPECTS):
Stainless steel or carbon steel is best for storage. Do not use pressure or heat with open flame to remove from drums. Positive displacement or centrifugal pump with slight heat traced lines are recommended for transfer. Storage temperatures of 70-160 degrees F are recommended. Minimal agitation/stirring is recommended.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS:
If user operations generate fume, or mist, use ventilation to keep exposure to airborne contaminants below the exposure limit. Approved respirators may be required in unventilated areas. Facilities should have eyewash and safety shower.

EYE/FACE PROTECTION REQUIREMENTS:
Eye protection is recommended. Safety glasses with side shields, goggles, or face shields should be used.

SKIN PROTECTION REQUIREMENTS:
Wash hands after handling. For brief contact, normal work attire should be sufficient. Neoprene or other impervious gloves are recommended for prolonged contact. Protect against thermal burns for heated product.

RESPIRATORY PROTECTION REQUIREMENTS:
Under normal use conditions, with adequate ventilation, no special handling equipment is required. If airborne concentrations exceed the OSHA TWA, a NIOSH approved dust mask is recommended. Respirators may be necessary in unventilated areas if fumes are present.

(Section 8 continued)

EXPOSURE GUIDELINES:
The ACGIH threshold limit value for particulates not otherwise classified (PNOC), is 10 mg/m3 for an 8 hour TWA.

9. PHYSICAL AND CHEMICAL PROPERTIES

Form:	Liquid
Color:	Golden brown
Odor:	Characteristic smoky odor
Solubility in Water:	Disperses
Specific Gravity:	1.0
Bulk Density:	approx. 8.4 pounds/gal
Boiling Point:	>212 Degrees F,
pH	6-9

10. STABILITY AND REACTIVITY

STABILITY:
This material is stable. Hazardous polymerization should not occur.

DECOMPOSITION:
Toxic decomposition products may be formed. Decomposition may produce fumes, smoke, oxides of carbon and hydrocarbons.

11. TOXICOLOGICAL INFORMATION

MISCELLANEOUS TOXICOLOGICAL INFORMATION
Not established.

12. ECOLOGICAL INFORMTATION

No information available.

13. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL:

Treat or dispose of waste material in accordance with all local, state/provincial, and national requirements.

14. TRANSPORTATION INFORMATION

PRODUCT LABEL: Chemical Change Agent

15. REGULATORY INFORMATION

No information available.

16. OTHER INFORMATION

Reason For Issue: Product Information
Prepared By: V. Giampa
Approved By: R. Potter
Title: Technical Services Manager
Approval Date: June 18, 2001
Supercedes Date: (initial release)

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