



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 26, 2001

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

Re: Questions Regarding The Use Of Product CLC-3 As A Coal Dust Suppressant
Crystal River Plant, Facility ID #: 0170004 004-AV

Dear Mr. Hunter:

We have received your request (dated October 16, 2001) to begin using Product CLC-3 (Chemical Change Agent/Dust Suppressant) on your coal as a means of suppressing fugitive dust. The nature of this intended material raises a few questions as to its ability to fall within the range of the chemical dust suppressants allowed by condition 57 of Appendix TV-3 in your Title V permit. The intent of condition 57 is to allow a chemical to be sprayed/applied to the surface of roads, yards, open stock piles, etc., for the purpose of controlling nuisance dust that could blown from these surfaces. Having a chemical applied to the surface of a coal pile would result in a significantly less volume of chemical than adding a chemical that completely coats each piece of coal. Because this proposal involves a material that has a significant heat value and that is commonly used independently as a fuel, we need to address the issue of whether this request should be more appropriately processed as a change in the method of operation.

We will need the following information so that we may be able to better assess your request:

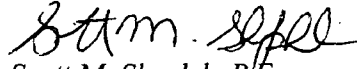
1. Please provide an ultimate analysis of the liquid tall oil and tall oil pitch. Include a chemical breakdown that shows individual components, as well as the percentages of hydrogen sulfide (and its related compounds) and other compounds that could be of concern with regards to odor and/or contemporaneous emissions increases.
2. Please provide information on the actual heat content of Product CLC-3 and compare it to the heat content of the coal to which it will be applied.
3. Please provide information on the maximum potential sulfur content of Product CLC-3 and compare it to the actual sulfur content of the coal to which it will be applied.
4. Based on the as-applied thickness, please provide an analysis of the total amount of Product CLC-3 that will be contained in a representative as-fired volume of coal.
5. Please provide a detailed evaluation of the effects of combustion of Product CLC-3, comparing future potential emissions to the past actual emissions from the intended boiler(s).
6. Please address the potential increase in hazardous air pollutant (HAP) emissions, as well as all criteria pollutant emissions, as a result of the combustion of Product CLC-3.
7. Please address the potential increase in emissions of heavy metals, if any, as a result of the combustion of Product CLC-3.
8. Is the coal feed rate directly and continuously controlled by the instantaneous heat input recorded at the boilers?
9. How are you proposing to insure that the permitted hourly heat input limit is not violated by the addition of Product CLC-3?

"More Protection, Less Process"

10. Please address the potential for odor as a result of the delivery, handling, storage, and combustion of coal treated with Product CLC-3.

Should you require any clarification regarding these questions, 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

SMS/jh

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

10/29/01 cc: Jonathan Holtom
Scott Sheplak
Reading Dale

Mailed on 10/29/01