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Bureau of  
Air Regulation

August 3, 1995

Mr. Syed Arif  
Department of Environmental Protection  
2600 Blair Stone Road, MS 48  
Tallahassee, FL 32399-2400

Dear Syed:

As a follow up to our conversation of August 2, 1995, the conditions for Seminole's proposed petroleum coke test burn at Palatka will allow for a 30 day test with a maximum 30% petroleum coke coal blend and a maximum petroleum coke sulfur content of 5.5% by weight. Our proposed test protocol is as follows:

Daily Test Load Schedule

| <u>Time</u> | <u>Load Description</u> |
|-------------|-------------------------|
| 0000-0800   | Low load at 350 MW      |
| 0800-1000   | Load increase to 500 MW |
| 1000-1600   | Mid load at 500 MW      |
| 1600-1700   | Load increase to 659 MW |
| 1700-2200   | High load at 659 MW     |
| 2200-2400   | Load decrease to 350 MW |

Test Schedule

|                |  |
|----------------|--|
| BL 1 & BL 2    | Baseline testing on contract coal using above daily schedule               |
| Day 1 - Day 5  | Test #1 - 10% petcoke blend using above daily schedule                     |
| Day 6          | Purge from 10% petcoke to contract coal following load, as necessary       |
| Day 7 - Day 11 | Test #2 - 20% petcoke blend using above daily schedule                     |
| Day 12         | Purge from 20% petcoke blend to contract coal following load, as necessary |

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Day 13 - Day 17                      Test #3 - 30% petcoke blend using above daily schedule

Day 18 - Day 30                      Test #4 - 30% petcoke blend following load, as necessary, until  
petcoke supply is utilized

Note: If test #3 presents any operational or environmental concerns, test #4 will utilize a 20% petcoke blend.

Seminole is now proposing to test burn up to 30% petroleum coke, which because of Seminole's long-term coal contract commitments, would offset the purchases of spot coal. This arrangement will result in the following average fuel qualities in the boiler:

| <u>Fuel</u>   | <u>Heat Content</u><br><u>(BTU/lb)</u> | <u>Sulfur</u><br><u>(%)</u> | <u>SO<sub>2</sub></u><br><u>(lb/MMBTU)</u> | <u>Utilization</u><br><u>(%)</u> |
|---------------|--|-----------------------------|--|----------------------------------|
| Contract Coal | 12,150                                 | 2.94                        | 4.84                                       | 65                               |
| Spot Coal     | 11,655                                 | 2.48                        | 4.26                                       | 5                                |
| Petcoke       | 14,000                                 | 5.50                        | 7.86                                       | 30                               |

This fuel arrangement will result in an SO<sub>2</sub> inlet loading to the FGD system of 5.717 lbs/MMBTU. Using this fuel analysis and a coal washing credit of 4%, SO<sub>2</sub> emissions from the unit should approximate 0.80 lbs/MMBTU.

As we discussed, you will prepare the approval letter for Seminole's petroleum coke test burn with the appropriate conditions. Your prompt attention to this matter is appreciated. If you have any additional questions, please give me a call.

Sincerely,



Kenneth L. Bachor  
Manager, Environmental Licensing

dc

cc: M. Opalinski  
P. Bertch