

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 26, 1990

William H. Green, Esquire  
Hopping Boyd Green & Sams  
123 South Calhoun Street  
P.O. Box 6526  
Tallahassee, Florida 32314

Re: FPL Orimulsion Test Burn

Dear Mr. Green:

Item No. 12 of FPL's Petition for Authorization to Conduct Testing and Research, stated that "...information is lacking on the performance of available flue gas desulfurization technologies for removing gasses from oil flames or flames from emulsified products such as Orimulsion. Thus, performance information must be generated through a demonstration test burn in order to enable proper design and sizing of necessary sulfur dioxide control equipment such as spray dryers and particulate control systems such as baghouses or precipitators."

In Exhibit 1 of the Petition, and again in the PSD air construction permit application, it was stated that "The ability to remove sulfur dioxide (SO<sub>2</sub>) from Orimulsion flue gases is also not well documented. Therefore, extensive pilot testing will have to be performed."

However, in your letter dated September 21, 1990, you have now informed the Department that a spray dryer, based upon data obtained from the burning of coal, can be designed, constructed, and guaranteed for full scale application in a plant conversion to Orimulsion.

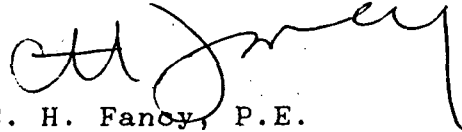
Why is it that, previously, data derived from the burning of coal was not adequate to select pollution control devices for the burning of Orimulsion, but now coal data is adequate? If a spray dryer can be designed from an analysis of data generated by the burning of coal, why can't the other proposed pollution control devices also be designed from available data generated by the burning of coal? Why are tests of this equipment while firing Orimulsion necessary?



William H. Green  
September 26, 1990  
Page 2 of 2

As we are in the final stages of preparing the PSD construction permit and Final Order, a prompt reply would be appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Fancy". The signature is fluid and cursive, with a large, sweeping flourish at the end.

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

c: D. Schwartz