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April 3, 1990

RECEIVED

OF COUNSEL

W. ROBERT FOKES

HAND DELIVERED THIS DATE

APR 02 1990

Dale S. Twachtmann, Secretary
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER-BAQM

RE: Petition for Authorization to Conduct Testing and
Research and Prevention of Significant
Deterioration Application/Florida Power & Light
Company Sanford Unit #4

Dear Secretary Twachtmann:

Please find enclosed for filing the original and two copies of the above-referenced Petition, submitted on behalf of our client, Florida Power & Light Company (FPL). As you will note, this Petition is being filed under Department Rule 17-103.120, Florida Administrative Code, which authorizes the approvals necessary to do testing and research of potential sources of pollution. The petition contains an exhibit on air quality analysis of the proposed test. The computer data for the test has been provided separately to Mr. Steve Smallwood of your staff, along with three complete copies of the attached. The proposal would allow a temporary test at FPL Sanford Unit #4 to determine the engineering, economic and environmental feasibility of adding a new fuel, known as Orimulsion, to the Company's fuel base. As is more fully explained in the attached, Orimulsion is a liquid fossil fuel produced in Venezuela that is being marketed at coal-equivalent prices.

Should the test prove to be successful, FPL is committed to the installation of pollution control equipment, as part of any permanent conversion to the use of Orimulsion, that would achieve a reduction in current emissions of sulfur dioxide and particulate matter. Therefore, the test program could lead to reduced emissions, less expensive fuel, and an expansion of Florida's fuel base. All of these goals appear

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to be consistent with the purposes of the Department's test rule and Chapter 403, Florida Statutes.

We hope to obtain all approvals needed for the test prior to September 1, 1990 so that testing can begin in late fall and conclude before the summer peak electrical demand period in 1991. We request that the Department review these submitted materials with a goal toward meeting in the next two or three weeks to discuss any additional information that might be needed to conduct its review. Your consideration in this matter is greatly appreciated.

Respectfully submitted,



William H. Green

WHG/wrn

Enclosure

cc: Steve Smallwood, DER (w/enc.)
Clair Fancy, DER (w/enc.)
Winston A. Smith, EPA (w/enc.)
Martin A. Smith, FPL (w/enc.)