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September 21, 1990

BY HAND DELIVERY

Mr. Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road, Room 306F
Tallahassee, FL 32399-2400

RECEIVED
SEP 21 1990

Dept. of Environmental Reg.
Office of General Counsel

Re: Orimulsion Test Burn
FPL Sanford Unit No. 4

Dear Mr. Fancy:

Please find enclosed a copy of Florida Power & Light Company's (FPL's) Proposed Final Order (Order). The Order would acknowledge the fact that the PSD permit for the test burn authorizes FPL to immediately begin construction of the facility needed for the Orimulsion test. FPL may not, however, exceed current emission limits until approval of the State Implementation Plan revision by the U. S. Environmental Protection Agency.

Accordingly, FPL suggests that the following language be included in Specific Condition 2 of the PSD permit:

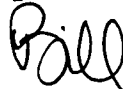
FPL may begin construction of facilities needed for the Orimulsion test burn as of the date of this permit. However, the emission limits of the current State Implementation Plan (SIP) shall remain in effect and are not to be exceeded unless and until the U. S. Environmental Protection Agency approves the SIP revision associated with the test burn.

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On a separate note, I am pleased to advise you of a favorable development that should simplify the required testing somewhat and reduce the amount of solid waste generated during the test. As you will see from the attached internal FPL memorandum, FPL very recently learned that the U.S. Department of Energy is sponsoring a demonstration project of an advanced high-efficiency spray dryer. FPL has determined that data which are currently available or will become available through suppliers, the Electric Power Research Institute, and the Department of Energy, will allow it to design, construct, and receive guarantees that would be necessary for full-scale application of spray dryer technology to Orimulsion in the event that that technology is selected. Thus, Dr. Ken Olen has recommended that the pilot scale lime spray dryer and accompanying fabric filter set-up originally proposed for slipstream 1A be eliminated. In subsequent discussions with Dr. Martin Smith, we believe that although this deletion will not shorten the proposed 90-day test period, because that test period is driven largely by the more time-consuming baghouse testing proposed, the elimination of slipstream 1A will further minimize the likelihood that FPL will request part or all of the additional 30 days potentially allowable for testing under the proposal.

On behalf of the Company and myself, we once again thank you and your staff for the expeditious and professional way in which you have handled this application for test approval, and we hope that your schedule and Secretary Twachtmann's schedule will permit the early issuance of the final approvals necessary for the project.

Respectfully submitted,



William H. Green

ARM/bjh
Enclosures

cc w/enc:
David Schwartz, Esq.
Mr. Steve Smallwood
Ms. Cindy Phillips