

**Crystal River COC PA 77-09 Mod. P**  
**Post-Certification Summary**

| COC Section/Page  | Item/Requirement  | Permit Requirement Timeline/Due Date  | Agency     | Description   |
|---|---|---|------------|---|
| <b>Sect. A - General Conditions Section</b>   |   |   |            |   |
| A.V.B.4 & 5, pg. 7  | General Permits   | Event Driven  | FDEP       | Requirement to obtain general permits (GP) involving dewatering activities as well as the GP involving discharge from concrete batch plants.  |
| <b>Sect. B. - Specific Conditions Section</b>   |   |   |            |   |
| B.I.B.4, pg. 27   | FGD Blowdown treatment alternatives study requirement   | Within 180 days of final order (by Jan. 28, 2013)   | FDEP       | New requirement to submit an evaluation of FGD BD treatment alternatives, including an estimated duration for completion and implementation of the alternatives. A consultant has been retained and the process begun.  |
| B.I.C., D, & E, pgs. 28-30  | Sludge/Solids Mgmt. requirements                        | Event Driven  | FDEP       | Requirements pertaining largely to keeping an up to date CCP/Solid Wastes Material Mgmt. Plan   |
| B.I.F., pg. 31  | Ash Storage Area Operations Plan                        | Within 120 days of Mod Q Issuance   | FDEP       | Mod. Q issued 2/8/2012 - deadline therefore was 6/7/2012. Plan was submitted 2/27/2012. No comments from FDEP within regulatory timeframe, hence approved by default.   |
| B.I.G, pg. 32   | Incorporation of CRN Domestic WWTP Permit               | Oct. 1 (1st. day of 2nd mo. following Mod. P issuance); Results due Nov. 28, 2012 and monthly thereafter. | FDEP       | There are no changes to the existing domestic wwtp DMR monitoring requirements.   |
| B.II.B, pgs. 41-45  | CR3-Specific Requirements, mostly involving ER issues   | Event Driven  | FDEP       | ER requirements for South laydown Yard, and HCTS Laydown Yard complete with both being transferred from construction to operations phases. ISFSI project nearing completion. Will need to incorporate inspection requirements/timeframes into overall site SWMS maintenance/inspection schedule.  |
| B.III.B, pg. 47   | Incorporates Existing Sodium Exemption                  | Event driven  | FDEP       | Outlines requirements for attaining additional groundwater standards exemptions (will require COC mod), as well as sets a time frame for renewing existing exemptions. In the case of sodium, requirement is to renew every 5 years from initial date of exemption, which, for sodium, will be by Jan. 31, 2016.  |
| B.V.A, pgs. 49 - 50   | FL Fish & Wildlife Cons. Comm. requirements             | Event driven  | FWCC       | Requirement typically rolled into the ER process, but since certain CRN drainage basins are now exempt from that process, the FFWCC still wants cursory surveys done, <b>prior to any construction activity</b> , to verify no impact to sensitive species (example they cite are terns nesting on old gravel parking lots).  |
| <b>B.VIII, beginning on pg. 51 Updated SWFWMD Conditions/Requirements</b>                         |   |   |            |   |
| B.VIII.C.1. pg. 51-52   | EMP Requirements  | 3 mgd trigger   | SWFWMD     | Allows for petitioning the District for relief from EMP monitoring requirements following 2 years of monitoring after 3 mgd trigger reached (this was in a previous COC version).   |
| B.VIII.C.6. pg. 52-53   | EMP Requirements  | Annual EMP Monitoring reports   | SWFWMD     | Changes monitoring period from water year to calendar year with final report due by Apr 1.  |
| B.VIII.D.pg. 53   | AWS Plan  | 3 mgd trigger for AWS plan submittal  | SWFWMD     | Provides relief from 3 mgd trigger schedule as outlined in the conditions following. Specifically allows for alternate schedule approved by the District.   |
| B.VIII.D. 1. pg. 53   | AWS Plan Submittal                                      | 6 mos. after reaching 3 mgd AADF.   | SWFWMD     | AWS Plan submittal due date, unless alternative schedule agreed to.   |
| B.VIII.D. 2. pg. 53   | AWS Preliminary Design Submittal                        | 2 years after reaching 3 mgd AADF.  | SWFWMD     | AWS preliminary design (from AWS Plan) due.   |
| B.VIII.D. 3. pg. 53   | EMP Environ. conditions summary                         | 2 years after reaching 3 mgd AADF.  | SWFWMD     | Provide analysis of environ conditions as outlined in EMP. If no adverse conditions have occurred, or are predicted to occur, will allow extension of AWS conditions.   |
| B.VIII.D. 4. pg. 53   | 3.2 mgd off-set   | 2 years after reaching 3 mgd AADF.  | SWFWMD     | Submit applications to FDEP and SWFWMD for off-set of 3.2 mgd groundwater withdrawal (unless time ext. or waiver granted). operations.  |
| B.VIII.D. 5. pg. 54   | AWS Implementation Schedule                             | 2 years after reaching 3 mgd AADF.  | SWFWMD     | Submit implementation schedule, including construction dated, etc., for AWS project identified in AWS Plan.   |
| B.VIII.D. 6. pg. 54   | Annual AWS Status Reports                               | 2 years after reaching 3 mgd AADF.  | SWFWMD     | By March 1 of each year (after reaching 3 mgd trigger) submit status reports on AWS project implementation schedule.  |
| B.VIII.E. 1-7 pg. 54-55   | Compliance reports                                      | Beginning Jan. 13, 2013 and every 5 years thereafter  | SWFWMD     | Compliance Report includes demand projections, water efficiency, updated modeling analyses, etc.  |
| B.VIII.F. pg. 55  | Pumpage reporting                                       | Monthly   | SWFWMD     | Typical monthly pumpage reporting requirement.  |
| B.VIII.F.1-7 pg. 55-56  | Production well flow meter requirements                 | Event Driven or every 5 years   | SWFWMD     | Requirements pertaining to non-re-settable, totalizing flow meters on production wells including: installation, accuracy, calibration schedules every 5 yrs.), reporting of malfunctions (notify within 30 days of discovery; repair/replace within 30 days of notification).   |
| B.VIII.H. pg. 56-58   | Water quality sampling                                  | Quarterly   | SWFWMD     | Typical periodic well monitoring (no change from previous mod.). Chloride, sulfate, & TDS monitoring of production wells (quarterly), and MZ wells (semi-annually); and monthly water levels of MZ wells.   |
| <b>Attachment H - IWW Groundwater Monitoring Operation &amp; Monitoring Requirements (GWMOMR)</b> |   |   |            |   |
| Sect. I.A.1-9, pgs. 2-4   | New MWs   | Well installation within 45 days of final order. Sampling within 30 days of well installation.            | FDEP - IWW | Contains requirements for installation of 2 new monitoring wells, and relocation of existing background MW. <b>Well installations have been completed</b> and installation reports have been submitted and accepted by FDEP. Primary & secondary drinking water sampling has been completed and results submitted to FDEP.  |
| Sect. I.A.8.b, pg. 4  | NE Solid Waste Wells                                    | Event Driven  | FDEP - SW  | Section contains a requirement that any new <b>solid waste</b> monitoring wells (beyond those already identified) that get installed, will need to have initial testing of parameters in Table 2, sect. I.B.3 (pg. 5-6) as well as ammonia, cobalt, and ORP (this done in lieu of the primary/secondary stds required for new IWW wells). Since MWB-30R is dually-classified as both an IWW well and a SW well, may need to sample for a few additional parameters beyond primary and secondary's (i.e. ammonia, cobalt and ORP).   |
| Sect. I.B.3, pg. 5  | Monitoring Well Sampling parameters                     | Sample collection beginning Oct. 1, 2012; first results due Jan. 28, 2013                                 | FDEP - IWW | Table 2 contains a list of sampling parameters and limits that apply to the compliance wells (note that certain limits listed, i.e. for arsenic and gross alpha) are superseded by the existing consent order that allows interim limits for these parameters.  |
| Sect. II.A.2 (table), pgs. 7-9  | CRS Perc Pond Requirements                              | Sample collection beginning Oct. 1, 2012; first results due Jan. 28, 2013                                 | FDEP - IWW | Authorizes a monthly average daily flow of <b>0.91 mgd</b> , up from the previous limit of 0.76 mgd. Also requires staff gauge readings in pond #4 in addition to the previous requirement to report staff gauge readings in the other 3 ponds. Finally, requires sampling and reporting of 4 new parameters: <b>silver, molybdenum, strontium and vanadium</b> at both EFF-1 and EFF-2.  |
| Sect. II.A.7 (table), pgs. 10-12  | CRN Perc Pond Monitoring Requirements                   | Sample collection beginning Oct. 1, 2012; first results due Jan. 28, 2013                                 | FDEP - IWW | Includes monitoring requirements pertaining to CRN perc pond (pond #5). There are a number of new requirements, including the need to quantify IWW flows into the pond; recording staff gauge readings; as well as several new parameters. This list is <b>nearly</b> identical to the CRS perc pond list <b>except</b> that <b>no sampling</b> for nitrate, cyanide, gross alpha, r226/228, silver, molybdenum, strontium or vanadium is required.   |
| Sect. II.A.9 & 10, pg. 12   | CRN IWW flow monitoring requirements                    | March 29, 2013 (flow meters)  | FDEP - IWW | Flows to the CRN perc pond now need to be quantified, either with flow meters, or other suitable methods, these latter subject to FDEP approval (e.g. pump timers). Flow meters are required to be installed by March 29, 2013.   |
| Sect. II.C., pg. 12   | Effective date of Monitoring and Reporting Requirements | Sample collection beginning Oct. 1, 2012; first results due Jan. 28, 2013                                 | FDEP - IWW | As with other permits FDEP issues, this requirement explains that the IWW monitoring and reporting requirements contained within Att. H. become effective the <b>second month</b> following the month in which Mod. P. was issued. Given that the final order was issued Aug. 1, 2012, this means that the monitoring requirements become effective <b>Oct. 1, 2012</b> (for quarterly monitoring, the 4th qtr of 2012). Until then, monitoring and reporting shall be done pursuant to the previous IWW permit. This is really for FDEP's benefit. It allows them time to get us updated DMRs to use that reflect the new monitoring requirements. |
| Sect. II.C., pg. 13   | Reporting requirements                                  | Sample collection beginning Oct. 1, 2012; first results due Jan. 28, 2013                                 | FDEP - IWW | Updated slightly from IWW permit in that FDEP now allows electronic submittal of DMRs (actually, they are making a push for us to migrate over to their eDMR system), and also clarifies that the Siting Office only wants to receive non-DMR submittals.   |
| Sect. IV.B.C. 1-3, pg. 15   | Perc Pond inspection requirements                       | Jan. 28, 2013, and annually thereafter  | FDEP - IWW | The new requirement includes annual inspections by someone qualified in performing dike/dam safety inspections (typically outsourced) followed up by a report certifying structural integrity.  |
| Sect. IV.B.C. 4, pg. 15   | Perc Pond inspection requirements                       | Event Driven  | FDEP - IWW | Perc pond dike inspections that may be done by site personnel after "significant" extended rain events. We'll put together a simple checklist that can be used to document these inspections, based on those used by other plants (i.e. Ancolte, Hines, etc.).  |
| <b>Attachment H., Solid Waste Conditions</b>  |   |   |            |   |
| Sect. VI.B.1.B. pg. 16  | SW MW Completion reports                                | within 60 days of mod. P (Sep. 30, 2012)  | FDEP - SW  | Submit monitoring well completion forms using DEP SW well installation form 62-701-900(30) for TW wells and MWB-30R. <b>Item completed - reports submitted to FDEP</b>  |
| Sect. VI.B.2. a pg. 16-17   | Solid waste monitoring well reporting requirements      | Sample collection beginning Oct. 1, 2012; first results due Jan. 28, 2013                                 | FDEP - SW  | Details how solid waste monitoring well results are to be reported electronically using FDEPs ADaPT program (see below for link).   |
| Sect. VI.B.2. a. pg. 17   | Additional groundwater monitoring reports               | semi-annual/annual beginning Jan. 1, 2012   | FDEP - SW  | Requirement to perform semi-annual contour maps and groundwater flow analyses with results summarized and submitted in an annual report within 90 days following the second semi-annual contour data collection effort. First report due 90 days following second semi-annual data collection effort (anticipated Sept. 2013).  |