BEFORE THE STATE OF FLORIDA

DIVISION OF ADMINISTRATIVE HEARINGS

In Re:	)	
	)	
Florida Power Corporation's Application for Certification of Crystal River Units 4 & 5	)	Case No. 77-2212
	)	
	)	

STATEMENT OF ISSUES BY THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Comes now the State of Florida Department of Environmental Regulation, by and through its undersigned attorney, and submits the following Statement of Issues to be considered at the certification hearing in the above-styled matter:

1. Whether there exists a necessity for expanded electrical generating capacity in the area to be served which requires the planned addition of Units 4 & 5.

2. Whether the Division of State Planning has found the proposed site to be suitable or unsuitable under the ten year site plan and the basis for such classification.

3. Whether the location and operation of Crystal River Units 4 & 5 produce minimal adverse effects on human health, the environment, the ecology of the land and its wildlife, and the ecology of state waters and their aquatic life.

4. Whether the operational safeguards proposed for Units 4 & 5 are technically sufficient for the welfare and protection of the citizens of Florida.

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5. Whether any expected environmental impacts from construction and operation at Units 4 & 5 are outweighed by the need for the facility.

6. Whether the applicant is entitled to the variances from State Standards and Regulations which it has sought by petitions filed in July of 1978.

7. The nature and extent of any heavy metals contamination from leachates.

8. Which of the various cooling water alternatives ought to be employed at Units 4 & 5.

9. The best available control technology for use at Units 4 & 5.

10. The application of prevention of significant deterioration requirements at Units 4 & 5.

11. Appropriate means of control for leachates from the coal pile and ash disposal areas at Units 4 & 5.

12. The conditions to be imposed upon certification if granted.

Sheri Smallwood

Sheri W. Smallwood
Assistant General Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing STATEMENT OF ISSUES BY THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION was sent to Barrett Johnson, Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32301, Larry Keesey, State Planning, Department of Administration, 660 Apalachee Parkway, Tallahassee, Florida 32301, Thomas E. Cone, Jr., Blain and Cone, Post Office Box 399, Tampa, Florida 33601, Wade Hopping, Mahoney, Hadlow & Adams, Barnett Bank Building, Tallahassee, Florida 32302, Gary Sams, Mahoney, Hadlow & Adams, Barnett Bank Building, Tallahassee, Florida 32302, Harry A. Evertz, III, Post Office Box 14042, Florida Power Corporation, St. Petersburg, Florida 33733, David Gluckman, 3348 Mahan Drive, Tallahassee, Florida 32304, Casey Gluckman, 3348 Mahan Drive, Tallahassee, Florida 32304, Chris Bentley, Division of Administrative Hearings, 530 Carlton Building, Tallahassee, Florida 32304, this 14th day of August, 1978, by United States Mail.

Sheri Smallwood

Sheri W. Smallwood
Assistant General Counsel

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