



February 14, 2011

Mr. Michael P. Halpin, P.E.
Administrator
Florida Department of Environmental Protection
Siting Coordination Office
3900 Commonwealth Blvd.
MS No. 48
Tallahassee, FL 32399-3000

Certified Mail
Return Receipt Requested

**Re: Florida Power Corporation
d/b/a Progress Energy Florida, Inc. (PEF)
Crystal River Fossil Plants
Petition to Modify Site Certification PA 77-09
Ash Storage Vertical Expansion and Other Misc. Projects (Mod P)
Bifurcation Request and
Response To FDEP's Request for Additional Information 2 IWW Comments**

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

FEB 17 2011

SITING COORDINATION

Dear Mr. Halpin:

After review of the Request for Additional Information (RAI) 2, issued by the Department on January 18, 2011, and after discussion with the Siting Office, PEF has concluded that the Department's Solid Waste Section requests and comments associated with the Ash Storage Vertical Expansion will take an extended time to resolve. Therefore, PEF requests that the Conditions of Certification be modified to address the remainder of the requests outlined in the Mod P application. The items requested to be addressed are as follows:

1. Incorporation of the CREC Industrial Wastewater Permit
2. Increase permitted flow to the South Percolation Pond System
3. Incorporate the Crystal River North Domestic Wastewater Permit
4. Reallocation of Per Well Water Use
5. Determination that the CRN stormwater system is capable of treating entire CRN area

To finalize the authorization of request 1, PEF offers the following responses to the Industrial Wastewater comments from the RAI 2. Please note that PEF no longer wishes to discharge treated coal pile runoff to the CRN percolation pond. As agreed to with the Power Plant NPDES Permitting Section, this discharge will be accommodated via the internal NPDES industrial wastewater system.

A INDUSTRIAL WASTEWATER PROGRAM

FDEP Comment:

Additional comments

a. Base on Attachment 12, page 4 and 6 of 7, the coefficient of horizontal permeability was assumed instead of field test to run MODRET to calculate the maximum water elevation and recovery time. In addition, the vertical field permeability testing was performed in 2007 before the pond was cleaned. The facility needs to provide unsaturated vertical and saturated Horizontal hydraulic conductivity based on field test (actual) conditions. Recalculate the maximum water elevation and recovery time based on actual conditions.

PEF Response:

PEF Response: On February 4 2011, PEF met with the Yanisa Angulo and Astrid Flores-Thiebaud of the Southwest District at which time a conference call was held with Marc Harris and Bala Nori, FDEP-Tallahassee. The meeting was to discuss items related the Crystal River Units 4 & 5 NPDES renewal.

During the meeting, PEF expressed that our first desire was to re-use and/or recycle treated coal pile runoff back into various process within the plant to off-set groundwater use. Two processes identified were to use this water for fugitive dust control on the existing ash storage area, or used as a source of bottom ash sluice makeup water. If not needed for these purposes, this water would be discharged, if needed, to the existing NPDES-permitted coal pile runoff collection system. This permitting approach was acceptable to both the FDEP-IWW and NPDES personnel. As such, we will no longer require COC authorization to discharge treated coal pile runoff to the CRN IWW percolation pond.

FDEP Comment:

b. Please provide the Department with the treatment volume of stormwater and freeboard that will be available at the CR 4 & 5 IWW percolation pond.

PEF Response:

PEF Response: The expected "normal" operating water elevation in the CRN percolation pond is between Elevation 93' and 94' CRPD (Crystal River Plant Datum). However, please note that this was the predicted operating level after adding the additional design flows from the treated coal pile runoff inputs added to pre-existing IWW flows. Given that FDEP has indicated that they will address discharge of treated coal pile runoff in the reissued NPDES permit rather than under the IWW portions of the COC, we believe operating levels will be somewhat lower. In fact, recent monitoring of CRN percolation pond levels have shown the pond to fluctuate between 92.6' and 93.2' CRPD, after percolation pond cleaning was completed at the end of 2010. These levels have been maintained even with higher than normal January rainfall.

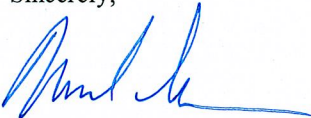
The lowest area of the CRN percolation pond berm (north side) is at elevation 97.5' CRPD. The remaining berm is about 100.5 +/- feet CRPD. Hence, free-board during normal operation is expected to be, at minimum, approximately 4 feet for the north side berm (low side) and more for the other sides. A 100 year precipitation event (11 inches in one day) would raise the pond level about 1.4 feet. This would provide, again, at minimum, over 2 feet of freeboard on the low side.

We believe that the FDEP – NPDES permitting groups intent to allow discharges of treated coal pile runoff (i.e. excess flows not recycled within those plant system examples above) to the NPDES-permitted coal pile runoff internal NPDES outfall, in lieu of discharging this treated water to the CRN industrial wastewater percolation pond, has resolved the issues with the Southwest District IWW personnel with respect to IWW flows to the CRN percolation pond.

PEF appreciates the Department's timely attention to this matter. PEF would appreciate a modification to the Conditions of Certification for the Site Certification Application PA 77-09 to include requests 1 through 5 as indicated above. The Ash Storage Vertical expansion can be addressed at a later date as appropriate.

If you have any questions regarding this submittal, please contact me at (727) 820-5588.

Sincerely,



Michael Shrader
Progress Energy Florida, Inc.
Lead Environmental Specialist
Environmental Services and Strategy

c: Ms. Cindy Mulkey, FDEP Siting Office
Mr. Danny Stubbs, FDEP SW District
Ms. Yanisa Angulo, FDEP SW District