

October 31, 1995

Mr. W. Jeffrey Pardue, Director  
Environmental Services Department H2G  
Florida Power Corporation  
P. O. Box 14042  
St. Petersburg, FL 33733

Re: Crystal River Salt Drift Study  
PA 77-09, PSD-FL-007

Dear Mr. Pardue:

The Department has reviewed the September 22, 1995, requests to modify the conditions of certification including the discontinuance of the salt drift monitoring effort. We have also examined the salt drift study status reports. It is the opinion of the Bureau of Air Regulation that your effort to-date satisfies at least an intensive salt drift data gathering phase.

The Department does not need to revise the PSD permit but consider Condition 5c to have been partially fulfilled. This can be clearly stated in your Title V permit application and clarified in the publicly noticed permit.

The salt drift impacts you attribute to the plant appear consistent with the predictions of the original environmental impact statement you submitted during your pursuit of approval of the NPDES permit. Your recent reports cited other phenomena such as hurricanes, salt spray due to increasing Gulf water level, and receding coastline which may explain some of the more significant vegetative deterioration in the vicinity.

We are unable to conclusively separate these effects from those of the plant. Therefore, we will require that you continue the overall program at a reduced intensity. This consists of monitoring for the rest of 1995, conducting another year of monitoring in 1998 and intermittently thereafter until it is evident that the situation has stabilized or that the effects from the plant can definitively be separated from natural processes.

Attached is a proposed amendment to the Conditions of Certification to reduce the salt drift monitoring

requirement. Also attached are other comments on your requested modifications. If you have any questions regarding the salt drift matter, please call Al Linero at (904) 488-1344.

Sincerely

Hamilton S. Oven, P.E.  
Administrator, Siting  
Coordination Office

Attach:

cc: Winston Smith, EPA  
John Bunyak, NPS  
Howard Rhodes, DEP  
Clair Fancy, DEP  
Bill Thomas, SWD  
All Parties

October 16, 1995

Mr. W. Jeffrey Pardue, Director  
Environmental Services Department H2G  
Florida Power Corporation  
P. O. Box 14042  
St. Petersburg, FL 33733

Re: Crystal River Salt Drift Study  
PA 77-09, PSD-FL-007

Dear Mr. Pardue:

The Department has reviewed the recent status reports and your requests to discontinue the salt drift monitoring effort. It is the opinion of the Department that your effort to-date satisfies at least an intensive salt drift data gathering phase.

We do not need to revise the PSD permit but consider Condition 5c to have been partially fulfilled. This can be clearly stated in your Title V permit application and clarified in the publicly noticed permit.

The impacts you attribute to the plant appear consistent with the predictions of the original environmental impact statement you submitted during your pursuit of approval of the NPDES permit. Your recent reports cited other phenomena such as hurricanes, salt spray due to increasing Gulf water level, and receding coastline which may explain some of the more significant vegetative deterioration in the vicinity.

We are unable to conclusively separate these effects from those of the plant. Therefore, we will require that you continue the overall program at a reduced intensity. This consists of monitoring for the rest of 1995, conducting another year of monitoring in 1998 and intermittently thereafter until it is evident that the situation has stabilized or that the effects from the plant can definitively be separated from natural processes.

It will be necessary to amend the Site Certification to allow the Department to determine in the future when the study is complete (without future modifications). Parties to the Certification as well as EPA will have the opportunity to comment on this proposed change.

If you have any questions regarding this matter, please call Al Linero at (904)488-1344.

Sincerely

Hamilton Oven, P.E.

cc: Winston Smith, EPA  
John Bunyak, NPS  
Howard Rhodes, DEP  
Clair Fancy, DEP  
Bill Thomas, SWD