

**From:** Heath, Mike [mike.heath@pgnmail.com]  
**Sent:** Tuesday, February 15, 2011 3:39 PM  
**To:** Doyle, Daniel  
**Cc:** Yowell, Doug; England, Louise  
**Subject:** CR-3 License Renewal NPDES and South Cooling Tower Update

**Categories:** Crystal River

As discussed in our earlier telephone call, I am including below minutes from the February 9 meeting between Progress Energy and FDEP that apply to your follow-up questions concerning the CR-3 NPDES permit and environmental issues associated with the helper cooling tower south (HCTS).

Mike Shrader and Doug Yowell met with Bala Nori (FDEP Permitting Engineer – Power Plant NPDES Program) and Marc Harris (FDEP Permitting Supervisor – Power Plant NPDES Program) on February 9, 2011 at the FDEP offices in Tallahassee. Also in attendance through part of the meeting was Alan Hubbard (FDEP Industrial Wastewater Permitting Supervisor) and various members of the FDEP Southwest District office (by teleconference). The purpose of the meeting was to discuss the most recent NPDES RAI issued for the CR 1,2 and 3 NPDES renewal application.

Mr. Nori and Mr. Harris informed us that the Department intended on proceeding with reissuance of the CR Units 1, 2, and 3 NPDES permit with a plan toward addressing 316(a) and 316(b) issues. In regard to 316(a), EPA Region 4 has been requiring plants to aggressively demonstrate compliance with 316(a) in order to renew any applicable 316(a) variance. To be consistent with Region 4, Mr. Nori and Mr. Harris will be requiring a similar 316(a) demonstration at Crystal River. They believe that these requirements will likely entail a two year study period that will need to be initiated after the EPU at CR3 and be completed prior the end of the permit cycle.

Specific to CR3, Mr. Nori and Mr. Harris were interested in the EPU and how we would comply with existing thermal limits considering we were withdrawing the HCTS from the current NPDES renewal application (to be addressed later as an NPDES permit modification should we proceed with construction).

Mr. Hubbard suggested that the most expedient way to incorporate the EPU was by issuance of an Administrative Order (AO) to be issued with the permit. It was proposed that the AO would require us to demonstrate reasonable assurance that we would be able to meet the current point of discharge (POD) thermal limit via fossil unit derate in lieu of building the HCTS. The use of an AO would also alleviate any need to insert a permit condition that could be more restrictive to Unit 1 and 2 operations. Mr. Harris and Mr. Nori feel that the final NPDES permit along with the AO could be issued by midsummer of this year.

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