



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

011702

JAN 5 1977

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Dept. of Environmental Regulation
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Mr. John Jackson
NPDES Supervisor
Florida Department of
Environmental Regulation
2562 Executive Center Circle,
Tallahassee, Florida 32301

JAN 17 1978

JAN 9 1978

D. E. R.
ENV. OF PERMITTING
NPDES SECTION

OFFICE OF SECRETARY

Re: Indian River Plant
NPDES No. FL0000680

Scholz Electric Generating
Center
NPDES No. FL0002283

John
Dear Mr. Jackson:

Enclosed for your information are comments from the U.S. Fish and Wildlife Service relative to the above referenced facilities. Should you have any questions or comments, do not hesitate to contact us.

Sincerely yours,

Charlie

Charles H. Kaplan
Coordinator
Thermal Analysis Unit

Enclosure



United States Department of the Interior

FISH AND WILDLIFE SERVICE

17 EXECUTIVE PARK DRIVE, N. E.
ATLANTA, GEORGIA 30329

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Cozart
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Project

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ENFORCEMENT
DIVISION
NOV 22 1977

Mr. John White
Regional Administrator
Environmental Protection Agency
345 Courtland Street, NE.
Atlanta, Georgia 30308

Dear Mr. White:

This is in response to Mr. George L. Harlow's letter of October 27, 1977, requesting the Fish and Wildlife Service to review and comment on Orlando Utilities Commission's Biological and Water Quality Studies in the Indian River near the Indian River Power Plant NPDES No. 0000680. Our comments are submitted in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401 as amended; 16 U.S.C. 661 et seq.).

In our October 28, 1977, letter, we expressed our concerns over the lack of coordination and guidance necessary in developing a coordinated study with Florida Power and Light Company (FPL) to address the impact of both this power station and the nearby FPL Cape Canaveral Plant on indigenous biota of the Cape Canaveral Pool.

If we had been consulted during study plan development for both power stations, our recommendation would have been to perform synchronized dye studies and thermal mapping at both plants to assess the extent of the respective thermal plumes and to determine the extent of recirculation at each power station and between the facilities. This basic study would have provided a basis for delineating the sampling stations and provided basic insight into whether biological damage was being sustained within the Indian River estuary. After a thorough review of the submitted document, the Service's position is that it does not fulfill the requirements for addressing a 316(a) once-through discharge system and does not adequately assess the impact of the thermal effluents into this important nursery area. The above views constitute the report of the Department of the Interior.

Sincerely yours,

Ray L. Vaughan

Deputy Regional Director



State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

MEMORANDUM

TO: Mr. Mickey Bryant, NPDES Administrator

THROUGH: Dr. G. J. Thabaraj, Chief, Bureau of Water Analysis
Dr. Landon T. Ross, Chief Biologist

FROM: Lawrence A. Olsen, Environmental Specialist

DATE: July 21, 1978

SUBJECT: Comprehensive - Power Plants - Evaluation of Gulf Power
Company Scholz Plant 316(b) demonstration

As you requested in your memo of 7 July, 1978, I have reviewed the document entitled "A 316(b) Demonstration for the Scholz Electrical Generating Center, Sneads, Florida." The 316(b) demonstration, as you know, requires the applicant to minimize the environmental impact of intake structures. Generally, this refers to impingement and entrainment and the applicant usually submits sample data from the site along with historical data and life history data. In the present case, the document presents no data on impingement or entrainment. All of the evidence presented regarding the fauna is indirect. In short, it is a literature review, with implications and theoretical predictions for the Scholz site based upon intake flow rates and river flow rates. However, I called the EPA lab at Athens, and apparently the original study plan did not call for anything extensive because of the expected minimal problem at the site.

The 80 MW plant, operating at capacity, pulls in 191.54 cfs (123.8 MGD) of water from the Apalachicola River; this is approximately 2.1% of the river volume at extreme daily low flow, or 1.7% of the 60 day average low flow. The report concentrates on the four species of anadromous fish which inhabit the river, all four of which are thought to spawn at the foot of the Jim Woodruff Dam, 3.6 miles north of the Scholz plant. Two of the fish, the Alabama shad and the skipjack herring, are abundant, but there is no known fishery for them. The third, the striped bass, is subject to a sport fishery and most are caught in the vicinity of the dam. A few years ago, the U.S. Fish and Wildlife Service gave up a stocking program because it could not determine if indeed the bass were spawning in the river. The fourth fish, the southern sea sturgeon, is present in small numbers, has adhesive, demersal eggs and is protected by law. The report does not address other fish in the area, such as sunfish, bass and catfish, because, the authors maintain, these fish spawn in quiet waters and their larvae are assumed to remain in those waters. Hence, entrainment would not be a problem for them because the water flows swiftly past the scholz plant.

Olsen Memo to Bryant
July 21, 1978
Page two

The authors conclude that, even if the striped bass are spawning upriver, the most the plant could do is to entrain about 2% of the eggs and larvae. They maintain that this would be hardly enough to worry about. This conclusion is based on the assumption of homogeneous distribution of eggs and larvae of all of the species involved. This assumption may or may not be valid. Without any field data, one just doesn't know. However, I'm inclined to agree that an 80 MW plant which takes in at most only 1 - 2% of the water flowing past, is not going to have a significant impact on the biota, particularly in this non-estuarine area. The only direct evidence appears to be in the area of impingement. Though no sampling program was undertaken and no data are presented, the authors do mention that intake screens are cleaned only infrequently at the plant because they do not clog up with debris or fish.

In conclusion, I doubt that this plant is having an impact which could be classed as "substantial damage" under 17-3.05. There are virtually no fish impinged and the volumes of water involved would seem to minimize any entrainment problem.

LOA:ds

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices
And/Or To Other Than The Addressee

To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

M E M O

TO: Larry Olsen

FROM: Mickey Bryant *MB*

DATE: July 7, 1978

SUBJECT: 316 B Study Demonstration
Gulf Power Company
Scholz Steam Plant FL0002283

Attached please find a copy of the above referenced study. The EPA had requested our comments on this by June 21, 1978. Since I only recently located the study, I would appreciate your comments as soon as possible. Please return the study document along with your comments.

On another similar matter, I have been requested to provide the department's current position on Big Bend Plant 316 Demonstration Study subsequent to the May 15, 1978 meeting you attended. Please let me know if you have any further comments on this subject.

MB:sp
Attachment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

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DEPT. OF
ENVIRONMENTAL REGULATION

Mr. Mickey D. Bryant
NPDES Administrator
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Re: Gulf Power Company
Scholz Steam Plant
NPDES No. FL0002283

Dear Mr. Bryant:

On November 21, 1977, Gulf Power Company submitted to our office a 316(b) demonstration on the Scholz Steam Plant. Our files indicate that a copy of the demonstration was forwarded directly by the permittee to you. Due to an oversight on our part, no specific request for review and comments was sent to DER.

We plan to approve the 316(b) demonstration in the near future. Should you have any questions or comments, please forward them by June 21, 1978. Your continuing cooperation is appreciated.

Sincerely yours,

Howard D. Zeller
Acting Chief
Water Enforcement Branch
Enforcement Division

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JUN 14

D. E. R.
DIV. OF PERMITTING
NPDES SECTION

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JUN 13 1978

BUREAU OF ENFORCEMENT



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

2600 BLAIR STONE ROAD
TWIN TOWERS OFFICE BUILDING
TALLAHASSEE, FLORIDA 32301

REUBIN O'D. ASKEW
GOVERNOR

August 1, 1978

JOSEPH W. LANDERS, JR.
SECRETARY

Mr. Howard D. Zeller
Deputy Director
Enforcement Division
U.S. Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30308

Dear Mr. Zeller:

Re: Request for Comments, Gulf Power
Company 316(b) demonstration
study, Scholz Steam Plant,
FL0002283; Jackson County

I apologize for not commenting sooner, but it took some time to locate our copy of the subject study.

Our department's biology section has evaluated the study and finds it basically provides literature review without presenting any actual data on impingement or entrainment at the site. Ordinarily no conclusions would be possible without this information, however, due to the small size of the power plant, the velocity of stream flow and the fact that only 1-2% of the stream flow is being circulated through the plant, the department is inclined to accept the proposition that the plant is not being operated in a manner that causes substantial impact on the biota and the department believes that substantial damage has not occurred.

If you need further comments, please let me know.

Sincerely,


Mickey D. Bryant
NPDES Administrator

MDB:sp
cc: N.W. District

Paul Parks
cc district & file

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SEP 7 1978

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SEP 12 1978

BUREAU OF ENFORCEMENT

Mr. George O. Layman
Director, Power Supply
Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520

Re: Scholz Electric Generating Center
NPDES Permit No. FL0002283

Dear Mr. Layman:

The November 21, 1977 submittal of your 316(b) demonstration for the referenced facility has been reviewed by this office and the State of Florida.

It is my determination that the intake structure represents an acceptable application of available technology for minimizing adverse environmental impact and that no modifications are necessary.

Sincerely yours,

Paul J. Traina
Director
Enforcement Division

cc: Dr. Paul C. Parks, Florida Department
of Environmental Regulation

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SEP 11 1978

GMBURTON:cmh:9/5/78:7428

DEPT. OF
ENVIRONMENTAL REGULATION



June 6, 1978

Mr. Charles Kaplan
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

RE: NPDES Permit FL 000 2283, Scholz Electric Generating Center,
Request For Change in Monitoring Requirements

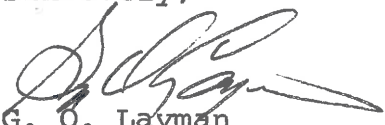
Dear Mr. Kaplan:

Gulf Power Company was issued the above referenced NPDES Permit on December 31, 1975. Since March of 1976, we have been regularly monitoring and reporting various waste streams as required by the permit including a once per month sample of ash pond effluent for metals analysis. While no specific permit limit exists on concentrations of metals in the ash pond effluent, there has been no occurrence of unusually high monitoring results.

The NPDES Permits for Gulf Power Company's other two electric generating centers, Crist and Lansing Smith, require metals monitoring of the ash pond effluent on the schedule of once per quarter. Based on historical analytical results which show no problems and Part III.B. of the Scholz Permit which allows changes in monitoring requirements, we request the metals sampling frequency of NPDES Permit FL 000 2283 be changed from once per month to once per quarter. This makes the Scholz Permit consistent with the Crist and Lansing Smith Permits.

If you should need any further information pertaining to our request, please call.

Sincerely,


G. O. Layman
Director, Power Supply

LRH/mf

cc: Mr. M. Bryant
Mr. R. V. Kriegal

