

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

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

To: _____	Locn.: _____
To: _____	Locn.: _____
To: _____	Locn.: _____
From: _____	Date: _____

TO: Rusi B. Charna

THRU: Robert Kriegel
Paul Parks *RP*

FROM: Don Jensen *DJ*

DATE: September 28, 1978

SUBJECT: Gulf Power Company Permits

The following comments apply to permit number IO32-11017 (Scholz):

1. Conditions #6, 15 and 16 appear redundant. They should be combined into one condition, being specific as in 15 and 16. Also, the same for conditions #13 and 17; #4 and 7; #5 and 11.
2. Have the original and supplemental applications been reviewed very carefully? Condition #6 permits everything in those applications and we may be permitting something we're not sure of or don't want to.
3. Condition #7 - the department should have knowledge of the sludge disposal practices and either approve or require modification at the time this permit is issued.
4. Condition #12 - this would be difficult to enforce when condition #5, 19 F & G allow the discharge of point source runoff.
5. This facility has a package STP for domestic waste treatment. If the department is issuing this type of permit (separate limitations page for each outfall), it would be better to include a limitations page for domestic waste effluent than to have it covered by a separate permit and have two or more permits to track.
6. Condition #18 - Does this work require construction or D/F permits?

7. Should the thermal discharge requirements of Chapter 17-3.05(3)(a) be included?
8. Condition #19C - Monitoring requirements for flow and pH are unclear.
9. Condition #19 F & G - Footnotes 1 & 2 relating to the monitoring requirements are unclear.
10. Condition #19G - Typo error - line 5.
11. Permit - should be issued to Gulf Power Company, c/o Mr. George Layman. This would simplify things if Mr. Layman left the company.
12. Permit - what are we permitting? Should better define entire facility (megawatt rating, number of boilers, etc.) and list outfalls. The outfalls are defined in the conditions (19A through (G)).

The following comments apply to permit number IO13-11016 (Lansing Smith):

1. Comments 1, 2, 3, 4, 6, 7, 11 and 12 (above) apply. Comment #5 may apply.

The following comments apply to permit number IO17-11016 (Christ):

1. Comments 2, 3, 4, 7, 11 and 12 (above) apply. Comment #5 may apply.
2. The following conditions appear redundant or need to be combined: #6, 15 and 16; #13 and 19; #4 and 7; #5 and 11.
3. Condition 20A - Typo error - selenium.
4. Condition 20D - The "Discharge Limitations and Monitoring Requirements" sections should be referenced to the "No limits" statement.
5. Condition 20E - Regional Administrator or State Director should be deleted and add the title of the person who will approve offsite disposal of wastes.
6. Gulf Power has been discussing our certification concerning - heavy metals monitoring - mixing zones - ambient levels of iron in Escambia River - with Mickey Bryant. It may be necessary to modify our certification condition #7.

Additionally, I recommend the following conditions be added to all three permits:

1. This permit does not relieve the permittee of liability for damages to the environment, to persons, or to property, and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules.
2. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
3. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

DJ:ac