

101115

OCT 12 1983

REF: 4WM-FP

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

RE: See attached list of Plants.

Dear Mr. Somers:

On November 19, 1982, regulations limiting the discharge of total residual chlorine (TRC) in once-through cooling water were promulgated (47 FR 52290, 40 CFR Part 423). These limitations restrict the discharge of TRC to 0.20 mg/l at the point of discharge to waters of the United States for a period which does not exceed two hours per day per unit.*

Options which are available to you, consistent with the enclosed Policy Guidance Memorandum, are as follows:

- (1) Minimize chlorine discharges and comply not later than July 1, 1984,
- (2) Conduct chlorine minimization studies and achieve compliance not later than October 15, 1984,
- (3) Construct dechlorination facilities to achieve compliance not later than November 19, 1985, and
- (4) A combination of options (2) and (3).

It is anticipated that the permit condition applicable to TRC, that will be incorporated in your NPDES permit(s) when reissued, will be similar to the following:

Not later than July 1, 1984, total residual chlorine (TRC) shall not be discharged at a concentration exceeding 0.20 mg/l at the point of discharge to waters of the United States for a period which exceeds two hours per day per unit. Notwithstanding this requirement, should the permittee implement a chlorine minimization study not later than

*Note: Limitations may be applicable to individual unit discharge(s) or multiple unit discharge(s) depending on actual point(s) of discharge. For multiple discharge units, BPT limitation for free available chlorine (FAC) may be more stringent (as a function of the number of units and the TRC to FAC ratio) than the BAT limitations for TRC and would be the controlling permit limitation. For instance, if the TRC to FAC ratio were 2.0 or less and more than two units were discharging through a single point source, a 0.2 mg/l FAC limit on each individual unit (BPT) would be more stringent than a 0.20 TRC limit on the combined discharge (BAT). In any case where a BAT limitation is less than the BPT limitation, NPDES regulations require the permit to contain the most stringent limitation.

- 1) Xc- Dist (Pensacola)
- 2) Ken Klos
- 3) File (Crist plant)

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December 31, 1983, which is generally consistent with the plan indicated as "Appendix A - Chlorine Minimization Program for Once-Through Cooling Water" (45 FR 68354, October 14, 1980), compliance with the above limitations shall be achieved not later than October 15, 1984. However, should the permittee find that dechlorination facilities are required to achieve compliance, he shall expeditiously implement a program to have such facilities constructed and operational to achieve the above limitations not later than November 19, 1985. Should the permittee propose to conduct a chlorine minimization study, he shall notify the Director not later than October 31, 1983 and shall submit a copy of the detailed study plan not later than November 30, 1983. Permittee shall conduct the study in a responsible manner and shall provide the Director with an interim report not later than June 30, 1984 and a final report not later than October 15, 1984. Should the studies conducted indicate that dechlorination facilities are required, permittee shall notify the Director as soon as the decision is reached, but not later than August 31, 1984, and shall provide him with a detailed implementation schedule to assure that necessary facilities are expeditiously constructed and placed in operation, but not later than November 19, 1985.

Additionally, it is anticipated that the implementation schedule will be in the following format:

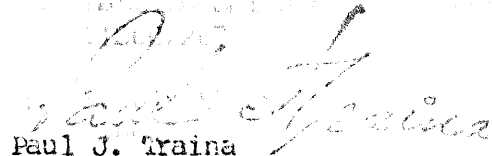
1. Compliance with total residual chlorine (TRC) limitations
(See Part III. .)
 - a. If a chlorine minimization study is not conducted:
 - (1) Compliance - 7/1/84
 - b. If a chlorine minimization study is to be conducted:
 - (1) Notify Director - 10/31/83
 - (2) Submit study plan - 11/30/83
 - (3) Implement study - 1/1/84*
 - (4) Submit interim report - 6/30/84*
 - (5) Submit final report - 10/15/84*
 - (6) Compliance - 10/15/84 (Unless dechlorination facilities are required)
 - c. If dechlorination facilities are required:
 - (1) Submit implementation schedule - 8/31/84*
 - (2) Progress report - 2/28/85*
 - (3) Progress report - 6/30/85*
 - (4) Compliance - 11/19/85*

* Notification shall be provided and scheduling expedited should it become evident that dechlorination facilities will be required.

In order to assure that you are in compliance with BAT chlorine limitations within the statutory time limit, it is requested that you evaluate present chlorine practices and previous minimization studies and notify us not later than October 31, 1983, as to the option which you plan to implement. Subsequently, you should proceed with implementation.

Should you have any questions, please contact Mr. Jim Newton at (404) 881-4793 or Mr. Robert McChes at (404) 881-2913.

Sincerely yours,



Paul J. Traina
Director
Water Management Division

Attachment

cc: ☒ Florida Department of Environmental Regulation