

Gulf Power Company
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the southern electric system

George O. Layman
Director of Power Supply

June 10, 1983

Robert F. McGhee, Chief
South Area Permits Unit
Facilities Performance Branch
EPA Region IV
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. McGhee,

Please find enclosed Gulf Power's formal comments on the recently issued draft NPDES permits for the Scholz Electric Generating Plant.

If you have any questions regarding these comments, please call Jim Vick of my staff at (904) 434-8311.

Sincerely,

George O. Layman

JOV/my

Enclosure

Replies to Comments for Scholz Electric Generating Plant, NPDES No. FL0002283

We concur with the following comments on the draft permit

Nos. 1, 2, 3, 4, 5, 6, 7, 11, 12, 13 and 15.

8. The final effluent guidelines provide for a total residual chlorine (TRC) limitation of 0.2 mg/l at the point of discharge to waters of the United States. The draft permit was based upon measuring the TRC level at the condenser outlet. We will agree to a level of 0.2, however it must be before it is mixed with any other wastes including the ash pond. Therefore, we are revising the location to read 50 feet before the point of discharge of the ash pond.

9. The reasoning behind these limitations is presented in our reply to comment number 9 for the Lansing Smith facility, FL0002267 and will not be repeated hear.

10. We cannot agree to a sampling frequency of less than 1/month (as was written in the previous permit) for any parameters for which effluent guidelines have been promulgated. We are not interested in gathering data but in assuring compliance with the effluent limitations.

14. The flow diagram presented in the application indicates that the sanitary wastes discharge to the discharge canal. Because of this fact, a serial number must be assigned to comply with the Clean Water Act. Further since all discharges must comply with secondary treatment these limitations must be included regardless of the size of the flow. However, since the current definition of secondary treatment does not include fecal coliform these limitations have been eliminated.