

JUL 12 1983

REF: 4WM-FP

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

Re: Lansing Smith Electric Generating Plant, NPDES No. FL0002267
Crist Electric Generating Plant, NPDES No. FL0002275
Scholz Electric Generating Plant, NPDES No. FL0002283

Dear Mr. Layman:

Enclosed are our replies to your comments for the above referenced facilities. Also enclosed are the drafts of the permits which we plan to proceed to public notice with.

I hope the meeting between Jim Newton and Charles Kaplan and representatives of your staff set for July 20 and 21 can resolve any differences so that we can proceed rapidly towards the issuing of these permits.

If you have any questions, feel free to contact Jim Newton at 404/861-4793.

Sincerely yours

Robert F. McGhee, Chief
South Area Permits Unit
Facilities Performance Branch
Water Management Division

JNewton:qdb:4793:7/7/83:0446Q

JN 7/11/83

Replies to Comments for Lansing Smith Plant, NPDES No. FL0002267

We can concur with the following comments on the draft permit

Nos. 1, 2, 3, 4, 6, 7, 10, 11, 12 and 13.

5, 8 for an explanation of our reasoning please refer to our reply to comments 12, 13 and 16 for the Crist Generating Station FL0002275.

9. By eliminating mass based limitations we must consider limitations other than 15/20, 30/100 for the ash pond. Many wastes enter the ash pond before they are discharged to the receiving waters. Many of these waste streams have differing effluent limitations. For example, coal pile runoff is limited to a maximum total suspended solids (TSS) concentration of 50 mg/l while low volume wastes are limited to a one day maximum of 100 mg/l and 30 day average of 30 mg/l.

To account for these various pollutants some sort of approach is necessary. We have elected to utilize a flow weighted procedure. We do not feel it is appropriate to penalize the environment by allowing the discharge limitations to be set at the maximum limitations of all the waste streams contributed.

The calculations at the Smith plant are difficult to perform because the pond is a recycle facility which discharges only under heavy rainfall conditions. It would be particularly damaging to allow the discharge of up to 100 mg/l TSS since under the dilution situation, the quantity the environment would have to absorb would be excessive. Past experience has shown a 20/50 to be more appropriate, however we feel in order to avoid an excessive amount of violations a 30/50 limitation would be acceptable.

Replies to Comments for Crist Generating Plant, NPDES No. FL0002275

We concur with the following comments on the draft permit

Nos. 1, 4, 5, 6, 7, 8, 9, 11, 14, 15, 17, 18, 19, 20 and 21.

We do not agree with the following comments:

2. The purpose for monitoring TRC once per week is not to develop a historical record but to assure compliance with effluent guidelines. A sampling period of once per month will not provide sufficient statistical information to assure this compliance.

3. The use of the helper cooling towers has been modified so that when all the units are off-line the towers do not have to be operated to cool ambient water. However, we do not feel that it is reasonable to operate the tower only as needed. It is our position that in order to eliminate this statement a full scale 316(a) biological demonstration must be conducted to ascertain the impacts of the thermal discharger. The previous study was found to be inadequate and resulted in the requirement for the helper towers. The previous study can serve as a base but the study would have to be conducted with the approval and guidance provided by EPA biologists from Athens, Ga.

10. We cannot change the ash pond oil and grease and total suspended solids effluent limitations to agree with the recently promulgated guidelines. The previous permit was more stringent than guidelines and therefore must apply. The anti-backsliding regulations prohibit us from relaxing these limitations, 40 CFR 122.44(1).

12, 13, 16. EPA regulations require mass limitations for all pollutants except for pH (40 CFR 122.45(f)). 40 CFR 423.12(b)(1) does allow the discretion to limit a pollutant in the steam electric category to concentration for metal cleaning wastes. However, we feel that for this particular waste stream it is necessary to include mass limitations to assure that the treatment of the waste stream is not due to dilution. Therefore, we have elected to retain the language as it was originally proposed.

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 here.

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.