

ADMINISTRATIVE RECORD

FACILITY Gulf Power - Scholz Steam

NO. FL0002283

DETERMINED TO BE: ☒ EXISTING SOURCE

☐ NEW SOURCE

These documents must be present in the Administrative Record:

- | | <u>YES</u> |
|---|-------------------------------------|
| 1. Application and Supporting Documents | ☒ |
| 2. Draft Permit | ☒ |
| 3. Fact Sheet or Statement of Basis and related documents | ☒ |
| 4. Public Notice | ☒ |
| 5. Final Permit & Transmittal Letter | ☒ |
| 6. Certified Mail-Return Receipt | ☒ |

These documents, if applicable, must be present in the Administrative Record:

- | | <u>YES</u> | <u>N/A</u> |
|--|-------------------------------------|-------------------------------------|
| 7. Other Documents
(correspondence between State, EPA & Applicant, telephone & meeting memoranda, compliance reports, etc.) | ☒ | ☐ |
| 8. New Source Determination & Comments | ☐ | ☒ |
| 9. Public Comments Received & EPA Responses | ☒ | ☐ |
| 10. State Certification | ☒ | ☐ |

These documents, if applicable, need not be physically present in the Administrative Record if specifically referenced and available in the Regional Office:

- | | <u>YES</u> | <u>N/A</u> | <u>Available
Elsewhere</u> | <u>Where?</u> |
|--|--------------------------|-------------------------------------|--------------------------------|-----------------------------|
| 11. Environmental Assessment
EIS and/or related documents | ☐ | ☒ | ☐ | <u> </u> |
| 12. Public Hearings - P.N. of Hearing,
Statements, Tape or Transcript | ☐ | ☒ | ☐ | <u> </u> |

CERTIFICATION: I have examined the referenced Administrative File and find the documents checked "yes" above are present in the file. Based on this examination, I certify that this file meets the Administrative Record Requirements of the current NPDES Regulations.

10-5-84
DATE

James I. Hunt
PERMIT WRITER (RECORD CLERK)

In case of MAJOR DISCHARGER, the first line supervisor shall concur with the certification.

DATE

SUPERVISOR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
315 COURTLAND STREET
ATLANTA, GEORGIA 30333

MAY 24 1984

REF: 4WM-FP

Ms. Suzanne Walker
Florida Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Crist Electric Generating Plant - NPDES No. FL0002275
Smith Electric Generating Plant - NPDES No. FL0002267
Scholz Electric Generating Plant - NPDES No. FL0002283

Dear Ms. Walker:

Enclosed are revised draft permits for the Scholz Electric Generating Plant, the Smith Electric Generating Plant and the Crist Electric Generating Plant. These revised draft permits should be considered by you for certification, and replace those forwarded with the certification request letter dated August 3, 1983. These draft permits are the result of considerable negotiations and are anticipated to be accepted by Gulf Power. We will public notice these revised drafts on May 24, 1984.

If you have any questions, please contact Jim Newton at (404) 881-2156 or Charles Kaplan at (404) 881-3012.

Sincerely yours,

A handwritten signature in cursive script, reading "John T. Marlar", is written over the typed name.

John T. Marlar, Chief
Facilities Performance Branch

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Locn.: _____	
To: _____	Locn.: _____	
To: _____	Locn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Files

FROM: Ken Klos *JK*

DATE: 6/20/84

SUBJECT: Gulf Power Company
Crist Power Plant FL0002275
Lansing-Smith Power Plant FL0002267
Scholz Power Plant FL0002283

These three coal-fired power plants all discharge once-through cooling water and ash pond overflow into surface waters. Their NPDES permits are being renewed so the draft NPDES permits reflect current EPA guidelines for steam electric power generation. In all three cases the state and draft NPDES permits contain a mixture of requirements. Therefore the recommended certifications begin by listing the items that are more stringent in the state permit. Next the requirements of the draft NPDES permit which are more stringent than the state permit requirements, if any, are listed. Thirdly, the requirements that are identical in the two permits are listed. Lastly, those requirements contained in the draft NPDES permit which are more stringent than the state's requirements with which the department is in concurrence are listed. These last requirements are in all cases monitoring of discharges, which the department considers to be internal to the plant's operation (such as cooling tower blowdown being discharged to an ash pond). It should be noted the state permit for the Lansing Smith Plant includes limitations on Outfall 002 (metal cleaning wastes discharged to the ash pond); therefore, those conditions are included as conditions of the certification also.

Also, the Lansing-Smith certification concludes with two very detailed addenda, which are not recommended to be conditions of the certification, but which EPA needs to be aware of.

Finally, the Crist certification begins with two explanatory conditions, which clarify significant differences between the draft NPDES permit and the state permit.

The district office has stated its intention to modify these three state permits to comply with Ch. 17-6.300(1)(a)2.e (iii) F.A.C., when the final NPDES permits are issued. That section of the F.A.C. requires state permits to be at least as stringent as the NPDES permits. Therefore, the condition of having some NPDES permit requirements more stringent than the state requirements will occur for only a short time.

Files
6/20/84
Page two

It should be noted that certification was originally requested on these three plants on August 3, 1983, but due to objections from the company, the draft permit was extensively revised and the second request for certification (May 24, 1984) is now being responded to. The revisions have made the draft NPDES permits more like the state permits, but still far from identical.

KK:sp

ENVIRONMENTAL PROTECTION AGENCY - REGION IV

PERMIT BRANCH

REPORT ON TELEPHONE CALL

TIME 9:20DATE 6/20/84FROM Vick / Harry at Gulf PowerTO Kaplan / Newton at EPA PermitsPROJECT _____ OR SUBJECT Request for extension of~~MESSAGE:~~ comment period for all 3 permits

Problems encountered / continuing on new ash
pond for Smith and in developing data
on ash pond volumes for Smith and
Crist. Seven day extension in providing
written comments (including the certification of
pond volumes) on all three permits
was requested. OK provided by Kaplan
subject to concurrence by McGhee & Patrice.
Gulf to provide letter requesting extension.

PERTINENT PHONE NUMBERS: _____

SIGNED

Charles Kaplan

Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520
Telephone 904-434-8354



George O. Layman
Director of Power Supply

the southern electric system

June 22, 1984

Ms. Earlene C. Hanson
Water Management Division
U. S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30345

Dear Ms. Hanson:

Ref: NPDES Permit Renewals for Gulf Power Company

Due to recent discussions between Charles Kaplan, Region IV-EPA and Jim Vick of Gulf Power regarding several issues contained in the recently noticed NPDES permits for Gulf's three electric generating plants, Gulf respectfully requests that a seven (7) day extension of the comment period be granted so that these issues may be addressed adequately.

Mr. Charles Kaplan, in a telephone conversation with Jim Vick on Wednesday, June 20, verbally agreed that an extension of the comment period would be acceptable to him.

Thank you for your consideration in this matter and if you have any questions, please contact Jim Vick of my staff at (904) 434-8311.

Yours very truly,

GOL:en

RECEIVED
EPA/IV
JUN 22 1984
SERVICES

Scholz Phone Conversations

- 4/26/83 Jim Vick - Gulf Power Co. : he asked for the flow weighting calculations for the ash pond in the draft permit - referred him to the attachment to the fact sheet and I explained procedure to him
- 5/17/83 Jim Vick : draft permit is still under review and comments should be sent ~~that~~ next week; fine with us
- 6/20/83 Jim Vick: Scholz comments on public noticed draft will be in mail early part of next week
- 7/26/83 Jim Vick: asked for the source of limitations for wastewater plant that it meet secondary.
- 8/10/83 Bill Howard - EPA: Scholz does have a STP discharge which was not included in old permit.
- 2/29, 3/13, 3/30, 4/2, 4/4 see notes in file and Crist or Smith files.
- 4/17/84 Jim Vick: asked him for the true low volume flows at plant, Scholz application shows considerable cooling water to pond packages aux. equipment etc. he replied that wasn't the case, application may be incorrect.
- 5/15/84 Jim Vick: gave him final ash pond limits of 15/20 O&G, 30/90 TSS and basis for nos.

6/5/84 Tom Vick: One comment on permit, thought we had agreed to language regarding REC monitoring point, permit does not reflect this. told him to put it in comment letter

Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520
Telephone 904-434-8354

Newton

George O. Layman
Director of Power Supply



the southern electric system

July 2, 1984

Ms. Earlene C. Hanson
Water Management Division
U. S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Hanson:

Ref: Draft NPDES Renewal Permit No. F1-000-2283
Scholz Electric Generating Plant of
Gulf Power Company

Please find the attached comments on the above referenced draft National Pollutant Discharge Elimination System (NPDES) for the Scholz Electric Generating Plant. The permit proposed to be reissued has been discussed during its development stages by personnel of the U. S. Environmental Protection Agency (EPA), Region IV, and Gulf Power. Those discussions have resolved virtually all issues associated with the permit. Nevertheless, Gulf believes that further comment is merited.

In spite of the attached comments, Gulf finds the proposed NPDES permit to be acceptable. I would like to take this opportunity to thank the EPA personnel responsible for developing this permit, and for their continued professionalism and courtesy extended to Gulf throughout the process of its finalization.

Yours very truly,

GOL:en

Attachment

EPA/REGION IV
ATTN: Mr. [illegible]
JUL 6 8 41 AM '84
MANAGEMENT
SERVICES SECTION

SCHOLZ ELECTRIC GENERATING PLANT

Specific Comments:

Page I-1

The draft permit states that total residual chlorine (TRC) sampling be conducted at the cooling water discharge structure. This location was cited in an earlier draft. After discussions with Charles Kaplan and Jim Newton of EPA-Region IV, the sampling location for TRC was revised to a point 50 feet before the confluence of the cooling water discharge canal and the ash pond discharge. This was confirmed in a telephone conversation with Jim Newton approximately three weeks ago. Mr. Newton indicated that the reason for the earlier draft language being in this draft was that the old language had not been deleted from the word processor. Gulf Power therefore requests that the sampling location for TRC reflect the location as agreed upon by Gulf Power and EPA, that being 50 feet prior to the confluence of the cooling water discharge canal and the ash pond discharge.

General Comments:

The draft permit proposes to impose flow-weighted concentration limitations on outfall serial number 002, the ash pond discharge. The methodology for developing effluent limitations is set forth in Attachments B and C of the draft permit. In the case of oil and grease limitations, EPA is proposing flow-weighted limitations that are numerically equivalent to non-adjusted effluent guidelines. In view of this result, Gulf can accept the proposed oil and grease limitations. However, it should be noted that as a matter of methodology, Gulf does not concur with EPA'S decision to afford zero credit for oil and grease associated with coal pile runoff into the ash pond.

The flow-weighted concentrations ratios proposed for total suspended solids discharged from the ash pond are 30 mg/l and 90 mg/l for the 30 day and 1 day averaging times versus the effluent guidelines values of 30 mg/l and 100 mg/l. Gulf is in general concurrence with EPA's methodology for arriving at these flow-weighted limitations, with the exception that Gulf does not concur that the credit given to coal pile runoff is appropriate in view of the lack of a guidelines limitation covering the same averaging times for this waste stream.

071911

KC
I left a note -
Let us discuss
with Power

Jim Vre⁽⁹⁰⁴⁾ 434-8311

Col #

P18 6500394

July 16, 1984

Dr. J. P. Subramani
NPDES Administrator
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Dr. Subramani:

State Certification of NPDES Permits

FL 000 2275 CRIST ELECTRIC GENERATING PLANT
FL 000 2283 SCHOLZ ELECTRIC GENERATING PLANT
FL 000 2267 SMITH ELECTRIC GENERATING PLANT

On July 13, 1984 you discussed certain errors in the referenced state certifications over the phone with Mr. Mike Oaks of this office. As you requested, the following is a written recapitulation of the changes agreed to in that conversation:

FL 000 2275

For outfall 002 (table 2), you are correct that the state discharge limitations are more stringent for TSS. However, the measurement frequency in the state permit is once per quarter, not one per week as you have indicated.

For outfall 003 (table 4), you have indicated that monitoring and discharge limitations are required at this location by the NPDES permit. This is incorrect, such oil and grease monitoring is not required by either the NPDES permit or the State permit. Point Source 003 is a lined boiler cleaning waste pond in which only boiler cleaning waste is treated prior to being discharged to the ash pond.

FL 000 2283

For outfall 001 (table 1), you indicate a more stringent state limit for zinc of 1.0 mg/L. The state permit limit for zinc is 0.03 mg/L. Also for outfall 001 (table 2) you indicate the NPDES limit for total residual chlorine is 0.1 mg/L. This is in error, the NPDES limit for total residual chlorine is 0.2 mg/L.

We did not receive the bottom half of table 1 with the limitations for outfall 002. Evidently, since your copy is 8 1/2 x 17, and ours is 8 1/2 x 11, this was simply inadvertently omitted in copying. Based on the information you transmitted on the phone to Mike, everything that was omitted is acceptable with the exception of the pH limits. For

outfall 002 you have indicated a more stringent state limit of 6.5 to 8.5. The state limit is more stringent, however for this outfall it is 6.0 to 8.5.

The heavy metals monitoring at 002 is included in the certification to track the state permit. As you discussed with Mike, this requirement was originally put in the state permit to track the NPDES permit, now that the NPDES permit is dropping the requirement and requiring monitoring for heavy metals at 001 instead, we will ask the state to drop this requirement from the 403 permit at the next permit renewal. You may want to consider dropping this provision as well.

FL 000 2267

For outfall 001 (table 2), you indicate that pH requirements are identical for the state and NPDES permits. This is correct, however the limits are 6.5 to 8.5 rather than 6.0 to 8.5 as you indicate.

For outfall 002 (table 3), you indicate that oil and grease monitoring and limitations are required at this location by the NPDES permit. This is the boiler cleaning waste pond for the plant, monitoring for oil and grease is not required by the NPDES or the state permit for this location.

For outfall 003 (table 2), an identical measurement frequency for oil and grease is indicated as 2/month. The NPDES and state permit both require a 1/2 weeks measurement frequency.

Also for outfall 003 (table 1), heavy metals monitoring is required at the ash pond again to track the state permit. However, the same discharge limitations as for 001 are also applied at this location. The state and NPDES permits for the location do not contain any limits for heavy metals at the ash pond discharge.

The comments pertaining to heavy metals monitoring at the ash pond location for Scholz Plant apply to Smith Plant also. We intend to ask that this requirement be dropped from the state permit when renewal time rolls around.

That is all the changes that were agreed to. Your cooperation in this matter is greatly appreciated. If you should have any questions or care to discuss the information contained in this letter please contact Mike Oaks at (904) 434-8429 or Jim Vick at (904) 434-8311.

Sincerely,



G. O. Layman

MFO:km

NOV 2 1984

1-0719

Closure of AO File

Director, Water Management Division
Region IV

Compliance Branch
Water Enforcement Division (EN-338)

SUMMARY

The following Administrative Order has been closed by this office:

Gulf Power Co. (Scholz Steam)
Chattahoochee, Florida

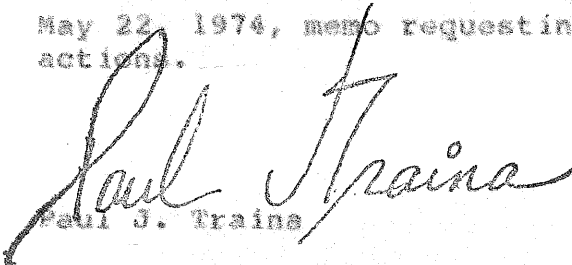
AO No. 83-202(wsss)
NPDES No. FL0002283

ACTION

Please close your file for this AO. The permit was reissued on October 1, 1984, with a November 1, 1984 effective date.

BACKGROUND

May 22, 1974, memo requesting copies of all Water Enforcement actions.


Paul J. Traina

cc: Victoria J. Tschinkel, FDER ✓

NOV 2 1984

REF: 4WM-FP

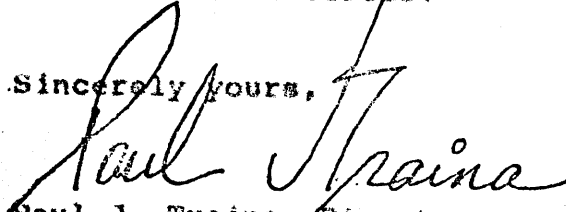
Mr. G. O. Layman, Director
Gulf Power Co. - Scholz Steam
P. O. Box 35
Chattahoochee, Florida 32324

Re: NPDES Permit No. FL0002283
Administrative Order No. 83-202(WSSS)

Dear Mr. Layman:

This is to advise you that Administrative Order No. 83-202(WSSS)
issued on August 18, 1983, has been complied with and placed
in an inactive status.

Sincerely yours,


Paul J. Traina, Director
Water Management Division

cc: FDER

Office of Regional Counsel
HDQ