

INTEROFFICE MEMORANDUM

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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.

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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