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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. Layman
JUL 6 8 41 AM '84
MANAGEMENT
SERVICES SECTION

SCHOLZ ELECTRIC GENERATING PLANT

Specific Comments:

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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.