

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 8½ x 17, and ours is 8½ 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