



the southern electric system

July 1, 1992

Ms. Karrie-Jo Shell
Environmental Engineer
Permits Section
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Dear Ms. Shell:

COMMENTS ON REVISED DRAFT PERMIT
NPDES Permit No. FL0002283
Scholz Electric Generating Plant

This letter is to confirm our telephone conversation of June 29 & 30, concerning my comments on the revised draft permit for Scholz Plant dated May 27, 1992. The following is a summary of our discussions and represents Gulf Power Company's comments on the remaining issues:

Pages I-1 and I-2

o Flow

We agreed that the measurement frequency listed for flow in Section A. 1. be changed from "1/hour" to "1/day". In addition, the monitoring location described in A. 5. should be changed from "at the discharge structure" to read "from circulating pump logs".

o Metals Limitations

I reiterated the comment contained in my April 14, 1992 letter concerning a change in the metals limitations for Scholz Plant. My understanding from our discussions is as follows. EPA's position is that such a change cannot be initiated without approval from the state of Florida even though the language has been applied by the Department of Environmental Regulation at two other Gulf Power plants. Gulf Power's position remains the same; that this change is necessary to account for analytical variability and background conditions as allowed by Florida's water quality standards.

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o Discharge Temperature

We agreed that the monitoring location described in Section A.5. for discharge temperature should be changed from "discharge structure" to read "condenser outlet".

o Total Residual Chlorine

There was some confusion over the sampling points for chlorine. As we discussed, the words "at the discharge structure" should be stricken from footnote 4 on page I-2. This will make it clear that the mixing zone for chlorine is 250 meters downstream of the FDER sampling location and not 250 meters downstream of the discharge structure.

I suggest that the language in Section A. 5. be revised to read as follows:

TRC (interim limit) at the discharge structure prior to mixing with any other waste stream; and TRC (final limit), metals and oil and grease at the FDER sampling point which is a point...

We agreed to insert the words, "the FDER sampling point which is" in order to define the exact location of this monitoring point. However, we did not discuss the other changes I am proposing here. These additions make it clear that the interim monitoring location for the effluent guideline based TRC limit is different than the final monitoring location for the water quality based TRC limit. I believe this was your intent. If not, please give me a call so that we may discuss it further.

Page I-3

o Chemical Metal Cleaning

We agreed that the word "chemical" should be inserted before the words "metal cleaning waste" in Section B. 1. since only chemical metal cleaning wastes would be discharged from outfall 003. As we discussed, non-chemical metal cleaning waste (i.e. water washing of air preheaters and boiler fireside) is discharged directly to the ash pond.

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Page III-2

o Section III. D.

I reiterated the comment in my April 14th letter concerning the advanced notification for chemical discharges. Specifically, that the lead time of six months is too long. You agreed to check into this issue further.

Page III-3

o Section III. I.

We agreed that condition I is redundant here and should be deleted.

Once again, thank you for considering Gulf Power's comments. If you should have any questions, or if I can be of further assistance, please do not hesitate to contact me at (904) 444-6429.

Sincerely,



Michael F. Oaks
Senior Environmental Affairs
Specialist

mfo/kjshell15

cc: J. S. Alves
M. L. Gilchrist
P. Parker
J. O. Vick