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Industrial Wastewater Section

Date: 11/24/98 10:42:17 AM
From: Bill Evans PEN *Bill Evans*
Subject: Scholz Generating Plant - Draft Permit- GWMP Part III and Gulf Power's N
To: Michael Hatcher TAL
CC: Victor Hultstrand PEN
CC: William Schaal PEN

Gulf Power reps Rachel Terry and Mike Markey discussed with me, on Monday 10/26/98, the GWMP of the draft permit. I have since reviewed Gulf Power's November 12, 1998 letter that provides official comments on the draft permit. I will also send you a copy of Vic Hultstrand's comments dated November 20, 1998. Vic's comments do not conflict nor add any other draft permit conditions other than those included with my comments below but due add support to the NWD's position.

The following items I agree should be changed but are not significant changes to the draft permit that would require providing notice again. Item numbers below match draft permit condition numbers:

OK III.H. Nickel as a GWMP parameter was to be deleted as noted in the Fact Sheet.

OK III.H. Typo error on units in parameter table; "T" should be micrograms.

OK III.H and I. Water level reference units should be consistent with current permit which uses "NVGD" vice "MSL".

Nat. Geodetic Vertical Datum

OK III.M. Measurement of rainfall data was not in the last permit and has no significant purpose for this facility. Gulf's comments propose reducing the draft condition to monitoring 4 weeks prior to the annual sampling event. NWD does not consider rainfall data necessary for this permit and recommends deleting this condition.

OK III.K and L. These conditions were in the last permit due to constructing new wells and abandoning old wells. These conditions are not required in this permit renewal.

OK III.P. Gulf suggested this could be clarified that the report is due 4 1/2 years after permit issuance with the renewal application not at the time this permit is issued for renewal. This is the intent of the draft permit.

The following items I did not agree should be changed:

OK III.H. To delete Gross Alpha and Radium 226 and 228 when triggered by Gross Alpha above 3.0.

NWD's position is that Gross Alpha and Radium 226 and 228 are constituents of ash and the Department wants to keep monitoring for reasonable assurance. The Department did reduce the GWMP monitoring from quarterly to annually in recognition of the long standing compliance. This site has not had the high background levels that were found at Plant Lansing Smith, so compliance should not be a problem. The trigger of gross alpha above 3.0 to test for both Radium 226 and 228 was due to what we learned from the monitoring results at Plant Crist that showed the old trigger scenario would have missed radium levels in violation

of ground water criteria.

bk III.H. To delete other metals that have been non-detect.

NWD's position is that the metals are constituents of ash and the Department wants to keep monitoring for reasonable assurance. The Department did reduce the GWMP monitoring from quarterly to annually in recognition of the long standing compliance. We discussed that if an identical metal was deleted in the Plant Smith permit, it may be reasonable to delete it in this permit. After the meeting, I compared the Smith and Scholz permit GWMP parameters, Smith had all the same parameters and more. The additional parameters were copper (SDWS), sodium (PDWS), turbidity, and zinc (SDWS). This excludes Smith having gross alpha and Radium 226 and 228 deleted and Scholz having Nickel deleted for site specific reasons.

I.A.2.a. To delete surface water monitoring for Nickel (spelling typo in draft permit) in the ash pond outfall.

NWD's position is that since Nickel was deleted from the GWMP then we would add or keep Nickel in the ash pond outfall to provide reasonable assurance that Nickel from the ash is not being mobilized. This is consistent with how we handles gross alpha and Radium in Plant Smith's permit.