

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 27-Aug-1998 11:21am
From: Bill Evans PEN
EVANS_B@A1@PNS1
Dept: Northwest District Office
Tel No: 850/595-8380 S/C 695-8380

To: Michael Hatcher TAL
CC: Craig Diltz TAL

(HATCHER_M@A1@DER)
(DILTZ_C@A1@DER)

Subject: Re: Gulf Power Scholz Draft Permit

Michael, My comments are below each of your questions and initialed BE. Your text is prefixed by <<. I also have some new comments below. BE

<<Bill,
<<
<<GP had previously requested (in a letter dated April 8, 98) a number of changes
<<to the permit that you did not address in your comments. I need your input on
<<a couple of them. They are (numbered the same as in their letter):
<<
<<5 & 8 - Request metals and radionuclides at Outfall D001 be deleted.

*we kept these
for other reasons -
see FS amendment
for Smith*

As we did at Plant Smith, we would concur that Outfall D001 could be reduced / deleted monitoring for metals (except as in Plant Smith keep Copper, Lead and Nickel on an annual basis) and radionuclides, but that the Ashpond Outfall would have semiannual reporting requirement, without a limit, for the same metals and Gross Alpha and Combined Radium 226 and 228. This would require either a specific reopener clause or rely on general condition #8 that the permit could be revised if the Ashpond discharge monitoring shows elevated metals or radionuclides. BE

<<18 - Request rainfall data only be collected 5 times per week and only during
<<plant operation (see permit condition III.M). Also, when and how is rainfall
<<data reported. The permit refers to an "annual monitoring report". What
<<report is that?

This was not in the last ground water monitoring plan for Plant Scholz, so I recommend rainfall data be deleted totally. The waste management program requires a rainfall data requirement for the Crist Plant ash landfill ground water monitoring plan. The annual report would have been corrected to whatever frequency the ground water monitoring report is submitted. BE

<<I would appreciate your comments on the above or any other comments on GP's
<<letter.

I could not find a copy of GP's letter dated April 8, 98. BE

New Items:

Domestic wastewater treatment plant outfall: Recommend adding Chlorine residual 0.5 mg/l and a fecal coliform limit of 200 as was included in the Plant Smith permit.