

INDUSTRIAL WASTEWATER

DRAFT PERMIT REVIEW FORM

Date Received: 5/15/2004

Permit Reviewer: Tara Kulkarni

PERMIT WRITER'S INFORMATION

Permit Writer: Tamara Blyden

District/Division: Tallahassee Office

Contact Number: (850) 245-8602

Extension: _____

GENERAL INFORMATION

Facility Name: Scholz Electric Generation Plant

Permit Number: FL0002283

NPDES: Major ☒ Minor ☐ Non-NPDES ☐

WAFR Facility Information: Matching ☐ Discrepancies ☒

Please edit facility name and address as well as the name of the responsible authority in WAFR as these are different from the information provided in the permit.

GENERAL PERMIT INFORMATION

Is this a new facility? Yes ☐ No ☒ N/A ☐

Is this an existing facility? Yes ☒ No ☐ N/A ☐

Is this draft permit a renewal? Yes ☒ No ☐ N/A ☐

Is this draft permit a revision/modification? Yes ☐ No ☒ N/A ☐

This draft permit accompanied by:

Notice of Draft ☒

Fact Sheet ☒

Statement of Basis ☐

Administrative Order ☐

Consent Order ☐

DMR ☒

Does the draft permit reference the AO and/or CO? Yes ☐ No ☐ N/A ☒

Does the order include interim limits and/or compliance Schedule as necessary? Yes ☐ No ☐ N/A ☒

Were all Federal and State Agencies given a copy of this draft permit per Rule 62-620.550, F.A.C.? Yes ☒ No ☐ N/A ☐

Additional Information:

List other documents that accompany this draft permit:
The permit writer provided a copy of the previous permit for this facility.

DRAFT PERMIT CONDITIONS

Does this draft permit have toxicity conditions?	Yes ☐	No ☒	
Does this draft permit contain a BMP?	Yes ☒	No ☐	
If so, what type of plan?	BMP ☐	BMP3 ☒	SWPP ☐
Are the conditions and parameters in this draft permit consistent with the Fact Sheet/Statement of Basis?	Yes ☒	No ☐	N/A ☐
Are the conditions and parameters in this draft permit consistent with the previous permit?	Yes ☐	No ☒	N/A ☐
Are the conditions and parameters in this draft permit consistent with the DMR?	Yes ☐	No ☒	N/A ☐
Are the effluent limitations in this draft permit consistent with the limitations presented in the Fact Sheet/Statement of Basis, DMR and WQS Rule 62-302.530?	Yes ☐	No ☒	N/A ☐
Does this draft permit have hardness-based metals? (If so, then check to see if they were done correctly.)	Yes ☐	No ☒	N/A ☐
Is Groundwater monitoring a part of this draft permit?	Yes ☒	No ☐	N/A ☐
Are the groundwater conditions correct and do they match the DMR?	Yes ☐	No ☒	N/A ☐
Does this draft permit contain mixing zones, variances, or SSACs?	Yes ☐	No ☒	N/A ☐
If there is a mixing zone, is it sized in accordance with Rule 62-4.244, F.A.C.?	Yes ☐	No ☐	N/A ☒
If other than a standard mixing zone, has the relief mechanism been approved by EPA?	Yes ☐	No ☐	N/A ☒
Are mixing zones, variances, or SSACs documented in the permit and Fact Sheet/Statement of Basis?	Yes ☒	No ☐	N/A ☐
Are there Other Monitoring Requirements in this draft permit? (If so, please list the other monitoring requirements)	Yes ☐	No ☒	N/A ☐

Draft Permits containing Total Maximum Daily Load (TMDL)

What is the classification of the receiving water body? Class III Fresh waters

Is this receiving water body listed on the 303(d) list for impaired waterbodies?

Yes ☒ No ☐ N/A ☐

Has the TMDLs for the receiving water body been developed?

Yes ☐ No ☒ N/A ☐

Have the TMDLs for the receiving water body been implemented?

Yes ☐ No ☐ N/A ☒

Are the TMDLs documented in the permit and Fact Sheet/Statement of Basis?

Yes ☒ No ☐ N/A ☐

(If so, please list the parameters)

Nutrients and fecal coliforms are listed as parameters of concern.

FACT SHEET/STATEMENT OF BASIS INFORMATION

Is there an explanation for the AO and/or CO?

Yes ☐ No ☐ N/A ☒

Is Antidegradation Analysis documented (if applicable)?

Yes ☒ No ☐ N/A ☐

Is the Basis for Endangered Species Documented?

Yes ☒ No ☐ N/A ☐

Does the Fact Sheet/Statement of Basis describe the final limits in the draft permit?

Yes ☒ No ☐ N/A ☐

How is reasonable assurance document?

Reasonable assurance has been provided.

PERMIT REVIEW COMMENTS

Draft Permit:

1. Typographical and grammatical:

a. On page 4, section I. A. 4., please consider adding the word "in" after "...water quality standard set in Rule..", the word "water" after "...Class III fresh water or the...", the word is to read "...whichever is greater.", and the word "in" on the last line "...shall be in compliance...". ✓

b. On page 9, in section I. E. 11, please consider adding the word "of" to read "...from the combustion of toxic..." ✓

c. On page 9, in section I. E. 13, please consider re-phrasing the first and second sentences to read "The permittee shall periodically survey all ash pond dikes and toe areas for structural integrity on an annual basis thereafter. The permittee shall certify..." ✓

d. On page 11, in section III B. 9, please consider editing the bullets from 1-6 to a-f. ✓

e. On page 11, in section III B. 9, please consider adding the word "and" in bullet b to read "...background well and downgradient wells." ✓

2. On page 2, please consider adding "in Part I through Part VII" in the last sentence. ✓

3. On page 3, please note that for the parameter description "pH", the daily minimum value is "6" in the previous permit, whereas a value of "6.5" is cited in this permit. Please verify which value is correct and consider editing accordingly. ✓ - make change in

top of
pg 3

4. On page 3, please re-consider whether footnote 1 is necessary. If it is, please consider re-phrasing the sentence. Please also re-consider whether footnote 3 is necessary, since this description is already provided in the permit condition I. A. 3. *do not ignore*
5. On page 4, in section I. A. 4, please consider indicating how the concentration of the intake cooling water can be calculated. *limit given - do not calculate*
6. On page 5, please consider adding the footnote 4, since it is missing. *delete*
7. On page 10, please note that the ground water monitoring well MW-210S, which is listed in the previous permit, is not listed in this draft permit. Please consider making the addition. *add B*
8. On page 10, please consider editing the units for arsenic from " $\mu\text{g/l}$ " to " mg/l " in accordance with the Table 1 in Rule 52-550 for the Maximum Contaminant Levels for Inorganic Compounds. ✓
9. On page 18, please note that the standard permit condition VII E. "Specific Conditions Related to Existing manufacturing, Commercial Mining, Silviculture Wastewater Facilities or Activities" is not included. Please consider adding/referencing this condition. ✓

Reminder: Please remember to update the BMP3 language to reflect the latest changes to the section as indicated in the e-mail dated 5/17/04.

Factsheet:

10. Please delete all extra spaces in the document.

DMR:

Please note that Monica Boland may have provided comments on the DMR and some of the following comments might be duplicated.

11. On page 2, please note that the "Quality or Concentration" column for the parameter description "Coliform, Fecal" reads 8.0, whereas the permit cites this value as "800". Please consider revising the DMR value to "800". *make change PB*
12. On page 3, please note that the parameter description "Chlorination Duration" is not listed in the DMR. *make change PB*
13. On page 5, please note that in the "Quality or Concentration" column for the parameter description "pH", the value is cited as "9.0 (Max, Day. Avg.)", whereas in the permit it is "9.0 (Maximum)". Please consider editing for consistency with the permit. *check PB*
14. For all ground water wells, please consider changing the monitoring frequency of all parameters to "Annually" for consistency with the permit. ✓
15. For all ground water wells, please consider revising the units of the parameter description "Arsenic, Total Recoverable" from " $\mu\text{g/l}$ ", to " mg/l " in accordance with the Table 1 in Rule 52-550 for the Maximum Contaminant Levels for Inorganic Compounds. ✓
16. Please consider adding the DMR for the ground water monitoring well MW210-S.

Reminder: Please do not forget to upload all parameters and limits from permit builder to WAFR after the permit has been issued by using the upload function in IWPB.

Note: These comments are provided to assist your district office in review of the preliminary draft permits documents. The comments provide herein are not the final position of the Department and may be subject to change after further review. If you have any questions about my comments on the permit review, please do not hesitate to contact me at (850) 245-8599 or Suncom 205-8599.

AUTHORIZATION SIGNATURE OF REVIEW

Reviewing Engineer: Tara Kulkarni
Supervising Engineer: _____

Date: 5/17/04
Date: _____