

**Florida
Power**
CORPORATION

February 21, 1983
3F-0283-23

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Environmental Reports

Dear Mr. Denton:

Pursuant to Crystal River Unit 3 Technical Specifications, Appendix B - Part II, Section 3.2, attached is a copy of the order changing NPDES Permit FL0000159 and the resulting Florida Power Corporation (FPC) notice to the Environmental Protection Agency (EPA) of our violation of the modified permit. A show cause order concerning this violation was issued by the EPA, and FPC is preparing a response.

Should you have any further questions concerning this matter, please contact this office.

Sincerely,

G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

Attachment

DVH:mm

cc: Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 3100
Atlanta, GA 30303

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 28 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REF: 4WM-FP

Mr. G. C. Moore
Vice President
Power Production
Florida Power Corporation
P. O. Box 14042
St. Petersburg, Florida 33733

RE: Florida Power Corporation
Crystal River Plant, Units 1-3
Citrus County, Florida
NPDES Permit FL0000159

DISTRIBUTION

B. L. Griffin
N. B. Spake
J. A. Hancock
H. A. Evertz
M. B. Foley, Jr.
W. S. O'Brien
R. W. Schooley



Dear Mr. Moore:

Pursuant to Section 309(a) of the Clean Water Act, the Director, Water Management Division, Region IV, United States Environmental Protection Agency (EPA), has determined that the above-named facility is in violation of its NPDES permit. As a result, the Director has issued a Section 309 Order which is enclosed.

Any person who violates a Section 309 Order shall be subject to a civil penalty not to exceed \$10,000 per day of such violation pursuant to Section 309(d) of the Clean Water Act.

If you have any questions concerning the enclosed Order, please contact Peter T. McGarry, Chief, Florida-Mississippi Unit, Industrial Operations Section, Water Management Division at 404/881-7428.

Sincerely yours,

John T. Marlar
Chief, Facilities Performance Branch
Water Management Division

Enclosure

cc: Mrs. Victoria J. Tschinkel, FDER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

IN THE MATTER OF Florida Power Corporation)
 Crystal River Plant)
NPDES PERMIT NO. FL0000159) ORDER NO. 83-17(WCAB)

ORDER PURSUANT TO SECTION 309
FEDERAL WATER POLLUTION CONTROL ACT

Pursuant to the authority of Section 309(a) of the Federal Water Pollution Control Act (33 U.S.C. §§1251 and 1319(a)) which has been delegated to me, I hereby make the following findings of fact and violations and order:

FINDINGS OF FACT

1. Florida Power Corporation (hereinafter, the Permittee) has an electrical generating facility which discharges pollutants into waters of the United States.
2. The United States Environmental Protection Agency, Region IV (EPA), has issued a National Pollutant Discharge Elimination System (NPDES) permit authorizing the above discharge from the facility by said Permittee.
3. The present NPDES permit expired February 28, 1980, but Permittee filed application on August 30, 1979 for re-issuance of the permit with an additional ash pond and low volume waste discharges; therefore, pursuant to 40 C.F.R. 122.5, the expired permit has continued in full force and effect.
4. Permittee has in September 1979, May 1980, December 1980 and January 1981, exceeded its effluent limitation for Total Suspended Solids (TSS) at discharge serial number (DSN) 004 (ash pond).
5. In order to alleviate the TSS problem at the DSN 004 ash pond, the permittee has proposed reactivation of an existing but currently non-discharging ash pond which would be used alternately with the DSN 004 ash pond to allow periodic maintenance on the off-line pond.

6. The proposed additional ash pond would provide storage capacity for 377,800 cubic yards of ash. An additional ash pond is proposed because the DSN 004 ash pond has not been able to effectively treat ash sluice wastewater from both coal burning units 1 & 2. The increased rate of deposition of ash in the DSN 004 ash pond has exceeded the rate at which it is being removed and has resulted in a reduction in the effective pond size, retention time, and settling efficiency. Since the total volume of waste water routed to the two ponds cumulatively is not proposed to exceed that now routed to the DSN 004 ash pond, the additional storage volume should substantially increase treatment efficiency applied to this waste stream. No additional wastewater to that currently routed to DSN 004 ash pond is proposed to be added to the waste streams for the two ponds now proposed.

7. Permittee has requested authority to discharge from the ash pond proposed for reactivation. Permit reissuance has not yet been completed.

8. The location of the proposed discharge is nearly directly opposite DSN 004 ash pond across the receiving stream.

9. The permit prohibits the discharge of low volume wastes to waters of the United States.

10. Internal discharges (Outfalls 003 and 007) direct low volume wastes to Outfall 006.

VIOLATION

1. The permittee has violated the terms and conditions of the permit by discharging low volume waste through discharge point 006.

2. The permittee has violated the terms and conditions of the permit by discharging in September 1979, May 1980, December 1980, and January 1981 through DSN 004 Total Suspended Solids in concentrations exceeding the effluent limitations in the permit.

ORDER

Based on the foregoing findings of fact and violation, and pursuant to the provisions of Section 309 of the Clean Water Act, as amended (33 U.S.C. 1319) it is hereby ordered that:

1. Upon receipt of this Order and lasting until the facility is authorized by an NPDES permit to discharge from outfalls 003, 006, 007, and 009, you are ordered to comply with the attached effluent limitations and monitoring requirements for the specified outfalls with limitation requirements for outfall 006 becoming effective April 1, 1983. Construction of the treatment system for wastes from outfall 003 shall be complete by March 31, 1983.

2. Permittee may reactivate an existing but currently non-discharging ash pond (DSN 009) which shall be used alternately with the DSN 004 ash pond to avoid TSS violations.

3. Permittee shall comply with all other terms and conditions of its present NPDES Permit.

4. Monitoring results obtained during each calendar month shall be summarized on a Discharge Monitoring Report form (EPA form 3320-1). Forms shall be submitted at the end of each calendar quarter and shall be postmarked no later than the 28th day of the month following the end of the quarter. This monitoring shall begin on the first day of the month following the date of this order or in the case of outfall 009 the beginning date of the discharge.

5. No portion of this order shall affect the emergency provisions contained in the permit.

6. This order shall expire and become null and void at the effective date of an NPDES permit.

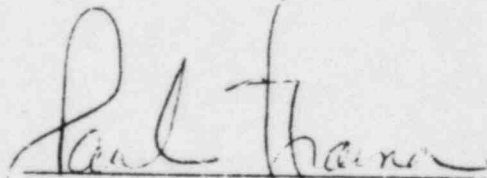
7. There shall be no point source discharge of the following categories of wastes to waters of the United States or to any waste stream which enters such waters except through DSN 003, 006, and 007 in accordance with the limitations indicated in the attachment to the Administrative Order: low volume wastes (including, but not limited to wet scrubber air pollution control systems, ion exchange water treatment systems, water treatment evaporator blowdown, laboratory and sampling streams, flow drainage, cooling tower basin cleaning wastes and blowdown from recirculating house service water systems), metal cleaning wastes (cleaning compounds, rinse waters, or any other waterborne residues derived from cleaning any metal process equipment including, but not limited to, boiler tube cleaning, boiler fireside cleaning and air preheater cleaning and specifically including such water wash operations as hosing down boiler fireside surfaces), sanitary wastes, boiler blowdown and construction runoff. Event recorders shall be placed at all overflow points from evaporation/seepage ponds receiving such wastes to assure compliance with this requirement.

8. Permittee shall submit monitoring information required by this Order to the following addresses along with monitoring information required by present NPDES permit:

Chief, FL/MS Unit
Industrial Operations Section
Water Management Division
United States Environmental
Protection Agency
345 Courtland St., N.E.
Atlanta, Ga. 30365

Mrs. Victoria J. Tschinkel
Secretary
Florida Department of Env. Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Date: DEC 28 1982


Paul J. Traina, Director
Water Management Division

During the period beginning on the effective date of this Order and lasting through expiration the Respondent is authorized to discharge from outfall(s) serial number(s) 003 1/ - Laundry and Shower Sump Tank (LSST) to OSM 006.

Such discharges shall be limited and monitored by the Respondent as specified below:

Effluent Characteristic	Discharge Limitations <u>3/</u>				Monitoring Requirements	
	<u>kg/batch(lbs/batch)</u> <u>2/</u>		Other Units		Measurement	Sample
	Daily Avg	Daily Max	(mg/l except as noted)		Frequency	Type
Flow-m ³ /Day (MGD)	-	-	N/A	N/A	1/batch	Calculation
Oil and Grease	0.11(0.25)	0.15(0.33)	15	20	1/batch	Grab
Total Suspended Solids	0.23(0.50)	0.76(1.67)	30	100	1/batch	Grab

Whenever metal cleaning wastes are discharged through this serial number, effluent shall not contain more than 8.345 lbs of total copper and total iron per million gallons of metal cleaning waste generated and shall be monitored 1/batch by grab sample.

Note: The radioactive components of this discharge are regulated by the U.S. Nuclear Regulatory Commission under the Atomic Energy Act and are not regulated by the U.S.E.P.A. under the Clean Water Act.

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/batch.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): discharge from the LSST treatment system prior to mixing with any other waste stream.

1/ Serial number assigned for identification and monitoring purposes.

2/ Daily average and daily maximum quantities discharged in kg/day(lbs/day) shall also be reported.

3/ Discharge limitations become effective April 1, 1983. Monitoring requirements apply immediately.

ATTACHMENT

During the period beginning on the effective date of this Order and lasting through expiration the Respondent is authorized to discharge from outfall(s) serial number(s) 006 - Nuclear Services and decay heat seawater system discharge to the Plant Discharge Canal to the Gulf of Mexico (includes OSN 003, 007, and the Evaporator Condensate Storage Tank (ECST) discharge).

Such discharges shall be limited and monitored by the Respondent as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	Daily Avg	Daily Max	Instantaneous Max	Measurement Frequency	Sample Type
006 Flow-m ³ /Day (MGD)	N/A	N/A	-	Continuous	Logs/Calc.
ECST Flow - m ³ /Day (MGD)	N/A	N/A	-	1/day	Logs
Total Residual Oxidants (mg/l)	-	-	0.4	1/week	Multiple Grab
Chlorine Addition (minutes/day)	N/A	60	-	1/day	Logs
Total Suspended Solids (mg/l)	N/A	30	-	1/week	Grab
Oil and Grease (mg/l)	N/A	15	-	1/week	Grab

Whenever metal cleaning wastes are discharged through this serial number, effluent shall not contain more than 8.345 lbs of total copper and total iron per million gallons of metal cleaning waste generated and shall be monitored 1/batch by grab sample.

Note: The radioactive components of this discharge are regulated by the U.S. Nuclear Regulatory Commission under the Atomic Energy Act and are not regulated by the U.S.E.P.A. under the Clean Water Act.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Total residual oxidants at point of discharge prior to entering plant discharge canal; flow at the combined intake water pumps; and flow, iron, copper, TSS, and oil and grease at the ECST discharge to OSN 006.

ATTACHMENT

During the period beginning on the effective date of this Order and lasting through expiration the Respondent is authorized to discharge from outfall(s) serial number(s) 007 1/ - Regeneration Waste Neutralization Tank (SDT-1) to OSN 006.

Such discharges shall be limited and monitored by the Respondent as specified below:

Effluent Characteristic

	<u>Discharge Limitations</u>		<u>Other Units</u>		<u>Monitoring Requirements</u>	
	kg/batch(lbs/batch) <u>2/</u>		(mg/l except as noted)		Measurement Frequency	Sample Type
	Daily Avg	Daily Max	Daily Avg	Daily Max		
Flow-m ³ /Day(MGD)	-	-	N/A	N/A	1/batch	Calculation
Oil and Grease	1.7(3.8)	2.3(5.0)	15	20	1/batch	Grab
Total Suspended Solids	3.4(7.5)	11.4(25.0)	30	100	1/batch	Grab

Whenever metal cleaning wastes are discharged through this serial number, effluent shall not contain more than 8.345 lbs of total copper and total iron per million gallons of metal cleaning waste generated and shall be monitored 1/batch by grab sample.

Note: The radioactive components of this discharge are regulated by the U.S. Nuclear Regulatory Commission under the Atomic Energy Act and are not regulated by the U.S.E.P.A. under the Clean Water Act.

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/batch.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): discharge from the SDT-1 treatment system prior to mixing with other waste streams.

1/ Serial number assigned for identification and monitoring purposes.

2/ Daily average and daily maximum quantities discharged in kg/day(lbs/day) shall also be reported.

ATTACHMENT

During the period beginning on effective date of this Order and lasting through expiration the Respondent is authorized to discharge from outfall(s) serial number(s) 009 - Ash pond discharge (Units 1 and 2).

Such discharges shall be limited and monitored by the Respondent as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day(lbs/day)		Other Units		Measurement Frequency	Sample Type
	Daily Avg	Daily Max	(mg/l except as noted)			
			Daily Avg	Daily Max		
Flow - m ³ /Day (MGD)	-	-	-	-	1/week	Grab
Oil and Grease	260(560)	340(750)	15	20	1/week	Grab
Total Suspended Solids	510(1130)	1700(3750)	30	100	1/week	Grab
Heavy Metals	See Below		See Below		1/month	Grab

Limitations are applicable to the combined discharges from both ash ponds, (004 and 009) although only one ash pond will be utilized normally. Discharges shall be separately monitored during any periods of discharge from both ponds.

Monitoring for heavy metals shall include total arsenic, cadmium, chromium, copper, iron, lead, mercury, nickel, selenium, and zinc.

Note: Limitations and monitoring requirements are not applicable during periods of no discharge.

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/week.

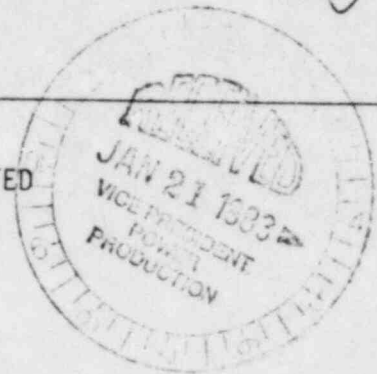
There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): discharge from the ash pond prior to mixing with any other waste stream.

bcc: N. B. Spake
J. A. Hancock
G. C. Moore
H. A. Evertz, III
D. A. Shantz
R. E. Parnelle, Jr.

**Florida
Power**
CORPORATION

CERTIFIED/RETURN RECEIPT REQUESTED



January 21, 1983

Mr. Peter T. McGarry
Chief, FL/MS Unit
Industrial Operations Section
Water Management Division
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30365

Re: Florida Power Corporation
Crystal River Plant
Order 83-17 (wCAB)

Dear Mr. McGarry:

On January 10, 1983, the discharge from outfall 007, Regeneration Waste Neutralization Tank (SDT-1), exceeded the 20 mg/l daily maximum limit for oil and grease. The measured value was 50.9 mg/l. A thorough assessment of this incident has taken place to determine the cause and develop means for avoiding this problem in the future. It was concluded that no equipment malfunction or operational action is attributable to the high oil and grease discharge. We suspect either a contaminated sample or analytical error.

As a matter of background, we have experienced several non-compliances via outfall 007 due to oil and grease since installation of the oil/water separation system in late 1981. During 1982 we initiated numerous operational and administrative actions in an attempt to eliminate the oil and grease problem. Our efforts met with some success as evidenced by only one high oil and grease discharge during the fourth quarter of 1982. It is evident that to assure compliance during all operational conditions, particularly startup and shutdown when very high wastewater flow occurs, additional system/equipment modifications may be necessary. We are investigating both short and long term solutions to this matter. When we meet with you in Atlanta concerning the Administrative Order, more specific actions will be presented.

We have also exceeded the 9.0 pH limit for this discharge as follows:

1/07/83 - 9.07

1/13/83 - 9.09

1/08/83 - 9.1

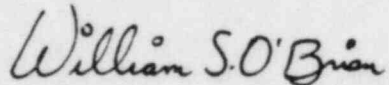
1/13/83 - 9.1

1/10/83 - 9.1

Mr. Peter T. McGarry
January 21, 1983
Page 2

In various discussions prior to issuance of the subject order, the EPA had not expressed a concern with pH control. At present there is no mechanism for us to control the pH of this discharge. We are currently reviewing the options available and will be prepared to discuss this item at our Atlanta meeting.

Sincerely,

A handwritten signature in cursive script that reads "William S. O'Brien".

William S. O'Brien
Director
Environmental & Licensing Affairs

WSO/gr

cc: Mr. J. P. Subramani, FDER