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AUTH. NAME AUTHOR AFFILIATION
 SCHMIERBACH, M. Tennessee Valley Authority
 RECIP. NAME RECIPIENT AFFILIATION
 HORN, C. Alabama, State of

SUBJECT: Comments on draft NPDES Permit AL0022080, per 890720 & 21 telcons.

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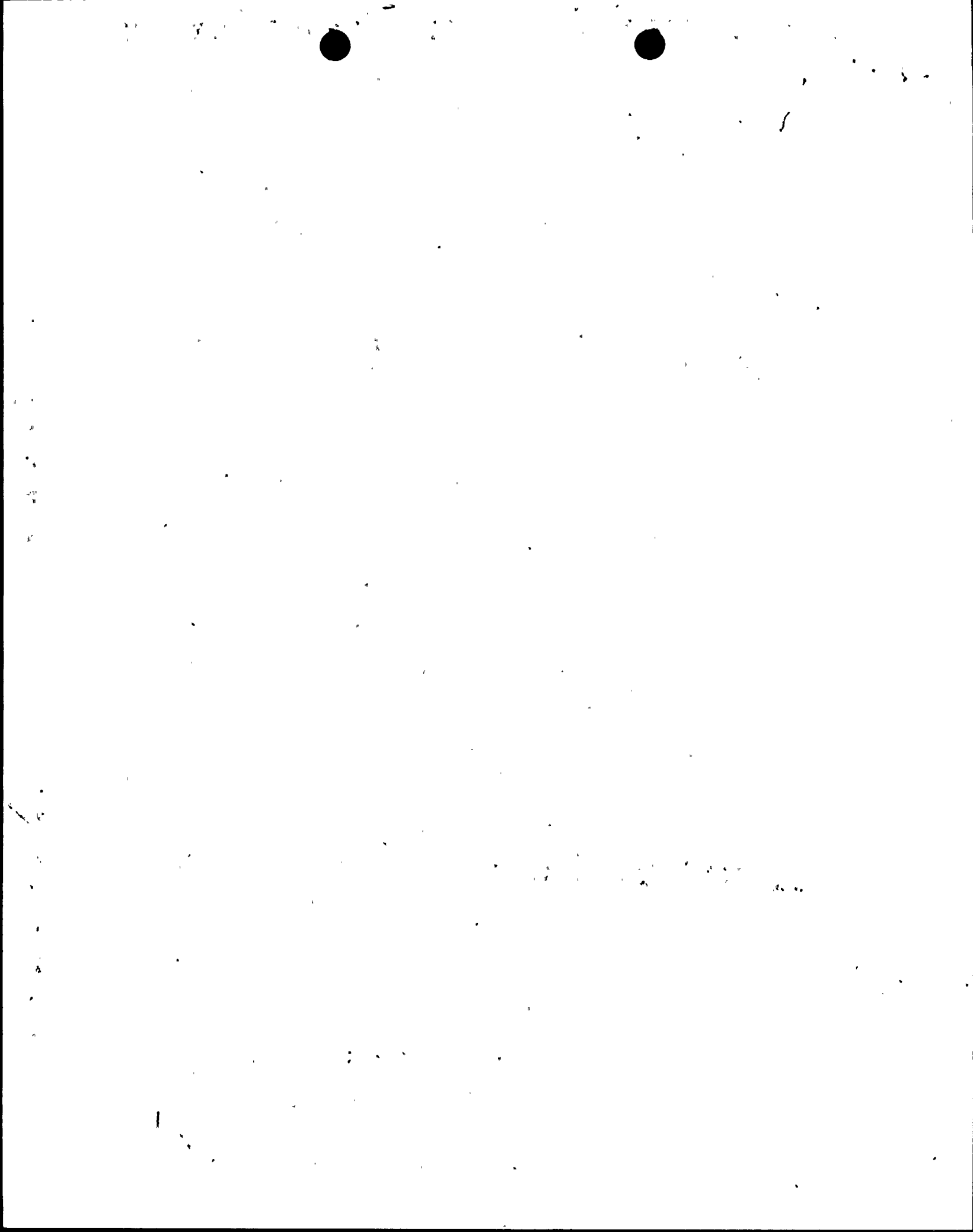
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TENNESSEE VALLEY AUTHORITY
KNOXVILLE, TENNESSEE 37902

JUL 26 1989

Mr. Charles Horn, Director
Water Division
Alabama Department of
Environmental Management
1751 Federal Drive
Montgomery, Alabama 36130

Attention: Mrs. Treena G. Piznar

Dear Mr. Horn:

TENNESSEE VALLEY AUTHORITY (TVA) - BROWNS FERRY NUCLEAR PLANT (BFN) -
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM DRAFT PERMIT NO. ALO022080

As relayed verbally to you by TVA staff on July 20 and 21, TVA does have comments on the subject permit. Briefly reiterated, our comments are as follows:

1. TVA continues to request approval to reroute DSN 107 and 110 to DSN 111 in order to provide a buffer between these discharges and the Tennessee River. Presently they discharge directly into the river. There are no process wastewaters contributing to DSN 107 or 110. An equipment room upstream of DSN 110 does contain compressors that may leak small quantities of oil, however, drip pans and an aggressive inspection and maintenance program will continue to prevent any of this leakage from impacting the discharge quality. The amount of oil that might potentially reach the lagoon is not enough to inhibit the biological activity in the pond. Past violations associated with these DSN's have been related to the disposal of food wastes into breakroom sinks. As part of the BFN's plan to prevent future violations and reopen the break room areas, we had planned to route these waste streams to DSN 111.
2. We request that the statement in Part 3, Section IV (page 18), referencing "no discharge of polychlorinated biphenyl" be changed by defining a numerical limit. An absolute discharge ban is unrealistic for a pollutant found to be ubiquitous in the environment. The potential for identifying the material continually improves as technology reduces the analytic detection limit. It seems appropriate to set permit limits that will discount values that merely reflect background concentrations.

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JUL 26 1989

Mr. Charles Horn

We look forward to further discussions concerning our permit renewal. If you should have any questions, please call Abraham H. Loudermilk, Jr., at (615) 632-6656 in Knoxville, Tennessee.

Sincerely,

M. Paul Schmierbach
M. Paul Schmierbach, Manager
Environmental Quality

cc: Mr. Bruce R. Barrett, Director
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