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Generation Services Department
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DUKE POWER

March 16, 1994

Ms. Coleen Sullins
Permits and Engineering Unit
North Carolina Department of Environment,
Health and Natural Resources
Division of Environmental Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Subject: Training and Technology Center
NPDES Permit No. NC0026255
Mecklenburg County
Schedule of Compliance
Certified: P 068 519 078
File: MC-702.13

Dear Ms. Sullins:

Recently we received a letter from you dated February 28, 1994, issuing the subject State NPDES permit. Per your correspondence, this permit will go into effect April 1, 1994. We would like to request a schedule of compliance and comment on the biomonitoring requirement which is referenced in the subject permit. Also, an attachment is provided which lists typographical changes suggested for the permit.

In the letter dated February 28, 1994, DEM agreed to change the test organism from the Fathead Minnow to Ceriodaphnia dubia. We would like to bring to your attention that, in Part III, Section G, of the permit, the wording for test organism still specifies Fathead Minnow.

In Part A, "Effluent Limitations and Monitoring Requirements Final" and Part I, Section B, "Schedule of Compliance", no compliance schedule was given to phase in the toxicity limit. In a Fax from DEM dated September 2, 1993, from Mr. Pandy Kepler, it was stated that: "It is normal procedure for a compliance schedule to phase in the toxicity limit. With the Duke Training Center permit, DEM will have Duke monitor for one year after the effective date of the permit. Upon which time, the limit will go into effect."

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We request that a compliance schedule be provided to allow adequate time to phase in this new toxicity limit. Since the permit will become effective April 1, 1994, we request one year, until April 1, 1995, to meet this requirement.

In a letter to you dated September 14, 1993, we described Duke Power's plans for the Training and Technology Center (TTC) to be connected to the Charlotte Mecklenburg Utilities Division (CMUD) municipal system. Since that earlier correspondence, more details of the plans can be provided to you.

Our present plans are to segregate the TTC's wastes into sanitary wastes and industrial wastes. The sanitary wastes will be sent to McGuire's sanitary treatment system (Outfall 003) and the industrial wastes will be sent to McGuire's conventional wastewater treatment system (Outfall 002). This will be completed prior to April 1, 1995.

This would essentially eliminate the Training Center NPDES permit. In early 1996, the connections will be completed to allow the sanitary wastes from McGuire to be sent to CMUD. McGuire's wastewater treatment systems are described under NPDES permit No. NC0024392.

We are presently in the process of preparing requests for an NPDES permit modification for McGuire and Authorization to Construct permits for both locations. You should be seeing correspondence on these subjects in the near future.

We appreciate the opportunity to provide our comments. If you have questions or need additional information, please contact me at (704) 875-5963.

Sincerely,



Norma G. Atherton, Scientist
Environmental Division
Water Protection

cc: Mr. Rex Gleason, NCDEHNR, Mooresville, NC.
Ms. Barbara Wiggins, Mecklenburg County Dept. of Env. Protection, Charlotte, N.C.

**SUMMARY OF TYPOGRAPHICAL CHANGES TO NPDES PERMIT NO.
NC0026255 FOR THE TRAINING AND TECHNOLOGY CENTER**

1. SUPPLEMENT TO PERMIT COVER SHEET:

In item 1 of this cover sheet, the first letter of the first word "continue" should be capitalized. Also, the word "seperate" in that first sentence is misspelled and should be "separate".

2. PART A: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS
FINAL (OUTFALL 001):

To the footnote described as "***Acute Toxicity", we suggest that the phrase "...Monitoring until April 1, 1995, when limit will take effect" be added.

In another footnote on the page, under "***Beta Emitters", we believe that the phrase "(based pm at least four samples collected quarterly...)" should probably read as (based on at least four samples, collected quarterly...).

3. PART A: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS
FINAL (OUTFALL 002):

Outfalls 002 and 004 are both chiller discharges. A footnote should be added to the page for outfall 002 to indicate "***Monitoring requirements only apply if chlorine is added to the cooling water." This statement already exists in the footnote for outfall 004.

4. PART III, CONDITION G:

As indicated in the cover letter, we request that the wording for the test organism be changed from Fathead Minnow to Ceriodaphnia dubia in this section of the permit.

State of North Carolina
Department of Environment,
Health and Natural Resources

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
Steven J. Levitas, Deputy Secretary



Division of Environmental Management
Water Quality Section
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FAX TO: NORMA IHERSON FAX NUMBER: 704 875 5038

FROM: RANDY KEPPLER
PHONE: (919) 733-5083

NO. OF PAGES INCLUDING THIS SHEET: 5

Attached are the draft effluent pages. Concerning the toxicity test, it is normal procedure for a compliance schedule to phase in the Tox. limit. with the Duke Training Center permit. DEM will have Duke monitor for one year after the effective date of the permit. Upon which time the limit will go into effect. Somewhere around October 94. If there are any more questions, please call.

Randy Kepler

A. () EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS FINAL

Permit No. NC0026255

During the period beginning on the effective date of the permit and lasting until expiration, the Permittee is authorized to discharge from outfall(s) serial number 001. Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitation:			Monitoring Requirements:		
	Monthly Avg	Weekly Avg.	Daily Max	Measurement Frequency	Sample Type	*Sample Location
Flow	0.0226 MGD			Weekly	Instantaneous	I or E
BOD, 5 day, 20°C	30.0 mg/l		45.0 mg/l	2/Month	Grab	E
Total Suspended Residue	30.0 mg/l		45.0 mg/l	2/Month	Grab	E
Fecal Coliform (geometric mean)	200.0 /100 ml		400.0 /100 ml	2/Month	Grab	E
Total Residual Chlorine				Daily	Grab	E
Temperature				Weekly	Grab	E
Mercury			2.0 µg/l	2/Month	Grab	E
Radioactive Substances ***				Quarterly	Composite	E
Acute Toxicity **						

* Sample locations: E - Effluent, I - Influent

** Acute Toxicity (Ceriodaphnia dubia, 24 Hour) at 90%; February, May, August and November; See Part III, Condition G. MONITORING UNIT
 OCTOBER 94 WHEN LIMIT WILL TAKE EFFECT.

*** i) Combined radium-226 and radium-228: the maximum average annual activity level (based on at least four samples collected quarterly) for combined radium-226 and radium-228 shall not exceed five picoCuries per liter.

ii) Alpha Emitters/ The average annual gross alpha particle activity (including radium-226 but excluding radon and uranium) shall not exceed 15 picoCuries per liter.

iii) Beta Emitters: the maximum average annual activity level (based on at least four samples collected quarterly) for strontium-90 shall not exceed eight picoCuries per liter; nor shall the average annual gross beta particle activity (excluding potassium-40 and other naturally occurring radio-nuclides) exceed 50 picoCuries per liter, nor shall the maximum average annual activity level for tritium exceed 20,000 picoCuries per liter.

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 2/month at the effluent by grab sample.

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

xc: Nuclear Regulatory Commission
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