

**Seiler, Ann**

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**From:** Nogas, Mary  
**Sent:** Wednesday, August 23, 2006 7:35 AM  
**To:** Seiler, Ann  
**Cc:** Oven, Hamilton; Raulerson, Emerson  
**Subject:** RE: Seminole Electric Cooperative, Putnam County - Ground Water Monitoring Conditions for Site Certification Modification Application No. PA 78-10A2

Good morning -- I'm Emerson Raulerson's supervisor in the Solid Waste Section in the District. Emerson is out on family sick leave this week, and I understand that the conditions are due to you on Monday. Is that a firm date, or do we have some more time to get them to you?

-----Original Message-----

**From:** Martin, Robert L.  
**Sent:** Tuesday, August 22, 2006 3:37 PM  
**To:** Seiler, Ann  
**Cc:** Oven, Hamilton; Davis, John; Cordova, Ed; Shi, Junhong; Rachal, Richard; Nogas, Mary; Raulerson, Emerson  
**Subject:** RE: Seminole Electric Cooperative, Putnam County - Ground Water Monitoring Conditions for Site Certification Modification Application No. PA 78-10A2

Ann, I have completed my review of the subject application, and have attached the ground water monitoring conditions for the upcoming modification for Unit 3. Please be aware that these conditions pertain to the Industrial Wastewater discharges only. Our Solid Waste Section should be sending you their response for ground water monitoring at the FGD landfill site, separately. I revised the Part III conditions to reflect current rule language and SOP requirements. I have also included an updated Ground Water Monitoring Report, and updated Monitor Well Location Map that is named Figure 5-1, instead of Figure 3. Thank you!

<< File: SeminoleElec\_GW\_Conditions.doc >> << File: Seminole\_Elec-GWDMR.doc >> << File: Seminole\_Elec-MW\_Lctn\_Map.jpg >>

*Rob Martin, P.E.*

**Professional Geologist**  
**FL Department of Environmental Protection**  
**Water Facilities\Ground Water Section, Room B-213**  
**7825 Baymeadows Way, Suite B200**  
**Jacksonville, Florida 32256-7590**  
**Email: Robert.L.Martin@dep.state.fl.us**  
**(904) 807-3341, SC 804-3341, Fax 448-4366**

-----Original Message-----

**From:** Seiler, Ann  
**Sent:** Friday, May 05, 2006 1:10 PM  
**To:** Martin, Robert L.  
**Cc:** Oven, Hamilton  
**Subject:** RE: Seminole Electric Cooperative - Ground Water Comments for Site Certification Application No. PA 78-10A2

Thank you Robert, I have received your comments and will incorporate them into the DEP response.

Ann Seiler  
Environmental Specialist - Web Manager  
Florida Energy Office, Siting Coordination  
Dept of Environmental Protection  
2600 Blainstone Rd. MS 48  
Tallahassee, FL 32399-2400  
(850) 245-8008  
[Ann.Seiler@dep.state.fl.us](mailto:Ann.Seiler@dep.state.fl.us) <<mailto:Ann.Seiler@dep.state.fl.us>>

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**From:** Martin, Robert L.  
**Sent:** Friday, May 05, 2006 10:53 AM  
**To:** Seiler, Ann; Oven, Hamilton  
**Cc:** Davis, John; Cordova, Ed; Shi, Junhong  
**Subject:** Seminole Electric Cooperative - Ground Water Comments for Site Certification Application No. PA 78-10A2

With regard to IW ground water monitoring issues, I have reviewed the subject application for the proposed addition of Unit 3. Please excuse the delay in getting my review to your office, but I was almost overlooked, and wasn't aware of the application until 5/2. I have the following questions and comments to include in the upcoming sufficiency response:

- 1) Once the facility eliminates the wastewater discharge(s) into the three percolation ponds, the ponds will need to be closed out. A condition can be included in the modified Site Certification that requires submittal of a pond closure plan 90 days prior to eliminating the wastewater discharge to these ponds.
- 2) Based on potentially known contamination sources, the current ground water monitoring plan will be modified to include the following additional parameters at the indicated frequencies and well locations: for the four monitor wells that are sampled quarterly, combined nitrite + nitrate, vanadium, and turbidity. For the five monitor wells that are monitored annually, the above mentioned parameters, total organic carbon (TOC), and total organic halogens (TOH). TOC and TOH will be included as annual parameters in the four wells that are sampled quarterly, also. After discussions with the plant staff, it was determined that there are no sodium chemicals used in the process, and monitoring will not be required.
- 3) At some point in time after the facility eliminates the waste discharge(s) into the three percolation ponds, the Department may allow a reduction in the ground water monitoring requirements for the industrial wastewater areas. Please provide a proposal indicating appropriate reductions for ground water monitoring after elimination of the percolation pond system. It should be noted that continued monitoring will be required for other potential sources of contamination at the facility. A condition can be included in the modified Site Certification that indicates separate monitoring requirements for before and after the ponds are eliminated.
- 4) A updated monitor well location map, drawn to scale, and in reference to the percolation ponds, landfill areas, property lines, roads, buildings, wetlands, water bodies, etc. is requested.
- 5) Since the facility has it's own on-site staff that conducts monitoring of the wells, please clarify that the sampling is conducted in accordance with today's DEP Standard Operation Procedure Manual for Field Sampling. This should include a brief summary of experienced personnel that are trained in sampling monitor wells, field\sampling equipment used, purge volumes and techniques, field measurements that are tested, decontamination procedures.

6) In Section 5.2.1, it is referenced that contact stormwater is discharged into an equalization basin. Please clarify if this basin is lined, or unlined, and the type of liner.

*Rob Martin, P.E.*

**Professional Geologist**

**FL Department of Environmental Protection**

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