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Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

MEMORANDUM

TO: Richard D. Drew
Wastewater Facilities Regulation Section

FROM: Norm Morrisette *(M)*

DATE: July 2, 1992

SUBJECT: Request for comments on Gulf Power/Scholz Plant -
FL0002283

The following comments are provided in response to your request:

1. The date of expiration has passed. Gulf Power submitted a timely application for renewal of the permit; permit was denied. We are now in process of resolving our concerns.
2. While there are not any actual enforcement actions, Gulf Power has requested additional time to petition our denial. Additional time was granted.
3. We expect that limitations in any permit issued will be substantially different than the proposed NPDES permit. Limitations for metals will be as listed in FAC 17-302; further, they will be required to monitor for oil and grease, gross alpha and radium (226 & 228).
4. A copy of the permit under which Scholz is operating is attached.

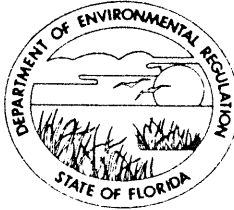
NM:nmd
Attachment

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501-5794



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROBERT V. KRIEDEL
DISTRICT MANAGER

May 12, 1986

Mr. George O. Layman
Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520

Dear Mr. Layman:

This is in response to Jim Vick's May 2, 1986 letter concerning permit I032-113566 for Scholz plant. We concur with your comments and the permit is changed as follows:

Condition 23: Change well No. MW-104A to MW-104B as a surficial monitoring well. The old MW-104A, which you state is screened in clay, must be abandoned properly through the Northwest Florida Water Management District. Floridan well MW-104 must be properly drilled as required by this condition.

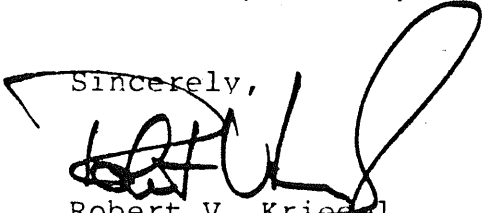
Condition 30: Change "intake canal" to "discharge canal."

Condition 34A: Change the measurement frequency for Intake Temperature to "once/hour." For Discharge Temperature, delete the discharge limitation, change the measurement frequency to "once/hour" and the sample type to "instantaneous."

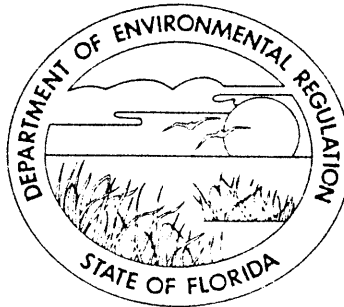
Condition 34B: Change the discharge limitations for Oil and Grease to 15 mg/l average, 20 mg/l maximum, and for Total Suspended Solids to 30 mg/l average and 100 mg/l maximum.

This letter shall be attached to and made a part of permit I032-113566.

Sincerely,


Robert V. Kriegel
District Manager

RVK/tmf



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

GULF POWER COMPANY
Scholz Electric Generating Plant
Jackson County

OPERATION
PERMIT

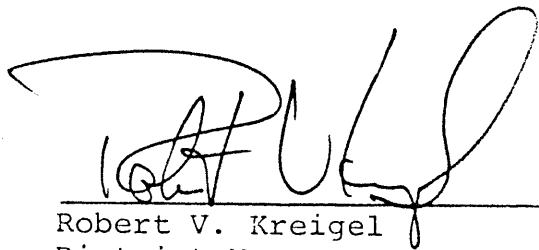
NO. I032-113566

DATE OF ISSUANCE

March 7, 1986

DATE OF EXPIRATION

February 1, 1991

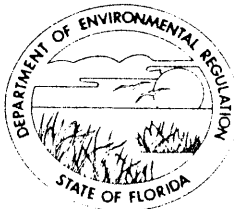

Robert V. Kreigel
District Manager

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER
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BOB GRAHAM
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DISTRICT MANAGER

PERMITTEE:

Gulf Power Company

I.D. Number: 1032P37371

Permit/Certification Number: IO32-113566

Date of Issue: MAR 7 1986

Expiration Date: February 1, 1991

County: Jackson

Latitude/Longitude: 30°40'08"N/84°53'13"W

Section/Township/Range: 12/3N/7W

Project: Scholz Electric Generating Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-4 and 17-6. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of a two-unit steam turbine electric generating station with wastewater discharges into the Apalachicola River. Wastewater from boiler blowdown, air preheater and precipitator wash, bottom ash, fly ash, and pyrites sluice, coal pile and yard runoff sumps, and other minor process streams are discharged into an ash pond. Sanitary wastes are pre-treated by an aerobic package plant. Ash pond discharge, sanitary plant effluent, main yard sumps overflow and main condenser cooling water are discharged into the river through a 850 foot-long canal. Switchyard runoff sumps discharge into the plant intake canal and overland east of the yard.

Located at the end of County Road 271, southeast of Sneads.

Operation shall be in accordance with the renewal application dated December 3, 1985

PERMITTEE:
Gulf Power Company

I.D. Number: 1032P37371
Permit/Certification Number: IO32-113566
Date of Issue: MAR 7 1986

Expiration Date: February 1, 1991

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

PERMITTEE:
Gulf Power Company

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Date of Issue: MAR 7 1986

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GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

PERMITTEE:
Gulf Power Company

I.D. Number: 1032P37371
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Date of Issue: MAR 7 1986

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GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurement;
 - the person responsible for performing the sampling or measurement;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:
Gulf Power Company

I.D. Number: 1032P37371
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Date of Issue: MAR 7 1986
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GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The operation of the pollution control facilities shall be under the full-time supervision of a person who is qualified by formal training and/or practical experience in the field of water pollution control.

16. The permittee shall submit monthly reports on the monitoring of water quality parameters as stipulated in condition 34. Monthly reports shall be submitted to the Northwest District Office, Department of Environmental Regulation, 160 Governmental Center, Pensacola, Florida 32501 no later than the twenty-eighth day of the following month.

17. Any diversion from or bypass of the facilities and processes described in the terms and conditions of this permit is prohibited except (1) where unavoidable to prevent loss of life or severe property damage, or (2) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Northwest District Office of the Department by telephone to be followed with written notification where necessary of each such diversion or bypass.

18. The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

19. There shall be no discharge of contaminated runoff to area surface waters.

20. Solids, sludges, waste, or other pollutants removed in the course of construction, treatment, or control of effluent shall be disposed of in such a manner so as to prevent said materials from entering waters of the State. Permittee shall obtain the Department's written approval prior to disposal of these materials.

PERMITTEE:
Gulf Power Company

I.D. Number: 1032P37371
Permit/Certification Number: 1032-113566
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SPECIFIC CONDITIONS:

21. Low volume process wastes shall be discharged to the ash pond. Demineralizer regeneration wastes shall be neutralized prior to discharge to the ash pond.
22. The allowable zone of discharge into ground water for this plant shall be horizontally, to the property lines or mean high water line; vertically, from the land surface to the top of the Floridan Aquifer. Within this defined zone of discharge, the minimum criteria for ground water listed in Florida Administrative Code Rule 17-3.402 shall apply. The standard for Class G-II ground water listed in Florida Administrative Code Rule 17-3.404 must be met at and beyond the boundary set forth above for the zone of discharge.
- ✓ 23. Twelve ground water monitoring wells (MW) shall be established as indicated on the plans and/or described below under the supervision of the Northwest Florida Water Management District. The following designations shall be used for ground water monitoring identification purposes for all future reference and analyses reports:

Floridan Aquifer Monitoring Wells

<u>Code</u>	<u>Well No.</u>	<u>Designation</u>	<u>Location</u>
1032A11454	WSW-2 ✓	Compliance	380' E of the Gypsum Stack
1032A11455	MW-103 ✓	Compliance	950' SSW of the Powerhouse
1032A11456	MW-104 Floridan (See 5/12/86 mod. letter)	Compliance	600' N of the SW Property Corner
1032A11457	MW-105 ✓	Background	2400' N of the SW Property Corner
1032A11458	MW-110A	Compliance	175' S of the Powerhouse
1032A11459	MW-112 ✓	Compliance	1150' E of the SW Property Corner

PERMITTEE:
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SPECIFIC CONDITIONS:

Surficial Aquifer Monitoring Wells

<u>Code</u>	<u>Well No.</u>	<u>Designation</u>	<u>Location</u>
1032A11460	MW-103A ✓	Intermediate	950' SSW of the Powerhouse
1032A11461	MW-104A MW-104 B (see 5/12/86 Modification Surficial letter)	Compliance	600' N of the SW Property Corner
1032A11462	MW-105A ✓	Background	2400' N of the SW Property Corner
1032A11463	MW-110	Intermediate	175' S of the Powerhouse
1032A11464	MW-112A ✓	Compliance	1150' F of the SW Property Corner
1032A11465	MW-113 ✓	Intermediate	400' NW of the Powerhouse

Monitoring wells 104 and 104A shall be located as graphically demonstrated on the original drawing, D-PS 4038-29 dated January 17, 1984. All other wells are located as graphically demonstrated on drawing D-PS 4038-29 redrawn on February 20, 1985.

24. Surficial aquifer monitoring wells shall be routinely sampled depending on water availability. Lack of water in surficial wells during routine sampling shall not constitute a violation of this permit.

25. An initial sampling of monitor wells 103, 104 and 105 shall be made with analysis for the Florida Primary and Secondary Drinking Water Parameters as listed in F.A.C. Rule 17-22.104(1) and (2) except (1)(e). Initial characterization shall include any routine indicator parameters not listed therein. In accordance with F.A.C. Rule 17-4.245(6)(k) the initial characterization of parameters shall be submitted within 90 days of receipt of this permit. All sampling and analysis shall be in accordance with methods outlined in F.A.C. Rule 17-4.246.

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SPECIFIC CONDITIONS:

26. Ground water monitoring wells shall be sampled quarterly. Sampling and analysis shall be in accordance with the procedures identified in Florida Administrative Code Rules 17-3.401 and 17-4.246. The samples shall be analyzed for the following parameters:

<u>Storet Code</u>	<u>Parameter</u>	<u>Units</u>
400	pH (field)	STD Units
82545	Water Level (field)	Ft. NGVD
95	Specific Conductivity (field)	Umho/cm
940	Chloride	mg/l
1067	Nickel	mg/l
900210	Cadmium	mg/l
900211	Chromium	mg/l
74010	Iron	mg/l
900220	Manganese	mg/l
945	Sulfate	mg/l
70304	TDS	mg/l
1105	Aluminum	mg/l

Water levels shall be recorded prior to evacuating wells or sample collection. Elevation referenced shall include the top of the well casing and land surface at each well site (NGVD) at a precision of plus or minus 0.1 foot.

27. Sampling for radionuclide analysis in accordance with F.A.C. Rule 17-2.104(1)(e) shall be reported for all wells twice a year.

<u>Storet Code</u>	<u>Parameter</u>	<u>Units</u>
1515	Gross Alpha	pCi/L
3515	Gross Beta	pCi/L

28. In the event that ground water monitoring shows violations of the applicable ground water quality standards, the owner shall arrange for a confirmation resampling within 15 days of receipt of laboratory results. If this resampling confirms the ground water contamination, the owner shall arrange for a meeting with the District within 15 days and shall be prepared to discuss at this meeting a corrective action plan as set forth in Florida Administrative Code Rule 17-4.245(7).

PERMITTEE:
Gulf Power Company

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SPECIFIC CONDITIONS:

29. The attached form 17-1.216(2) shall be reproduced by the permittee and used for future submittals. A separate report is required for each monitoring well. All analyses and reports on the monitoring of water quality required by this permit shall be submitted to the Northwest District Office. Use the codes identified in Condition 23 as "Well Name" on this form.

✓30. Intake screen wash water may be discharged into the ^{discharge (See 5/12/86 Mod. letter)} ~~intake~~ canal without limitations or monitoring.

31. The permittee shall apply to this office for renewal of the permit no later than December 1, 1990 in accordance with Florida Administrative Code Rule 17-4.09.

32. The permanent identification number for this facility is 1032P37371. Please cite this number on all reports and correspondence concerning this facility.

33. There shall be no significant discharge of floating solids or visible foam.

(34 A & 34 B Modified - See 5/12/86 modification letter.)

Gulf Power Company

I.D. Number 1032P37371

Permit/Certification No. 1032-113566

34. The surface water discharge limitations and monitoring requirements to be reported monthly are as follows:

A. Main plant discharge canal (Serial No. 001) (Note 1)

<u>Storet</u>	<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
		<u>Maximum</u>		<u>Measurement Frequency</u>	<u>Type of Sample</u>
50053	Flow (MGD)	---		Once/hour	Pump logs
900223	Intake Temperature °C (°F)	---		Once/ day hour	Instantaneous
900224	• Discharge Temp. °C (°F)	34.4° (-94.0°)		Continuous Once/hr	Recorder Instantaneous
50060	• Total Residual Chlorine	0.2 mg/l (Note 2)		Once/week	Multiple Grab
400	• pH (S.U.)	6.0 min/8.5 max		Once/week	Grab
556	• Oil & Grease	5.0 mg/l		Once/quarter	Grab
900208	• Arsenic	0.05 mg/l		Once/quarter	Grab
900211	• Chromium	1.0 mg/l		Once/quarter	Grab
900218	• Copper	0.03 mg/l		Once/quarter	Grab
74010	• Iron	1.0 mg/l (Note 3)		Once/quarter	Grab
900212	• Lead	0.03 mg/l		Once/quarter	Grab
	• Fecal Coliform	800/100 ml (Note 4)		Once/quarter	Grab
900213	• Mercury	0.0002 mg/l		Once/quarter	Grab
900210	• Cadmium	0.0008 mg/l		Once/year	Grab
1067	• Nickel	0.10 mg/l		Once/year	Grab
900214	• Selenium	0.025 mg/l		Once/year	Grab
900221	• Zinc	0.03 mg/l		Once/year	Grab

Note (1) Sampling location shall be approximately 200 feet downstream from the ash pond discharge prior to the confluence of the canal and the Apalachicola River. Use reporting code 1032x10741 for this point.

(2) Sampling location for total residual chlorine is at the discharge structure. Use reporting code 1032x10741 for this point. Chlorine may not be added to the condenser cooling water intake for greater than two hours per day. A mixing zone is granted 250 meters downstream of the sampling location.

(3) Or the value of the total iron concentration in the intake stream, whichever is greater.

(4) Sampling for fecal coliform shall not be done on the same day that chlorine is being introduced to the condenser cooling water intake.

B. Ash Pond Discharge (Serial No. 002) (Note 1)

<u>Storet</u>	<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
		<u>Monthly Average</u>	<u>Maximum</u>	<u>Measurement Frequency</u>	<u>Type of Sample</u>
50053	Flow (MGD)	5/12/86 Modification ---		Once/week	Weir Elevation
556	Oil & Grease	7.5 mg/l	20 40 mg/l	Twice/month	Grab
900146	Total Suspended Solids	30 20 mg/l	100 50 mg/l	Once/week	24 hr. comp.

Note (1) Sampling location shall be the ash pond discharge weir. Use reporting code 1032x10757 for this point.

C. Metal Cleaning Wastes (Serial No. 003) (Note 1)

<u>Storet</u>	<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
		<u>Maximum</u>		<u>Measurement Frequency</u>	<u>Type of Sample</u>
900218	Copper	1.0 mg/l		8/Batch	Composite
74010	Iron	1.0 mg/l		8/Batch	Composite

Note (1) Sampling location shall be at the discharge point of any portable chemical cleaning facility prior to discharge into the ash pond. Use reporting code 1032x11510 for this point.

D. Sanitary Treatment Plant Discharge (Serial No. 004) (Note 1)

<u>Storet</u>	<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
		<u>Monthly Average</u>	<u>Maximum</u>	<u>Measurement Frequency</u>	<u>Type of Sample</u>
80082	Biochemical Oxygen Demand, 5-day	30 mg/l	60 mg/l	Once/quarter	Grab
530	Total Suspended Solids	30 mg/l	60 mg/l	Once/quarter	Grab

Note (1) Sampling location shall be at the outlet box at the sanitary sewage treatment plant. Use reporting code 1032x11511 for this point.

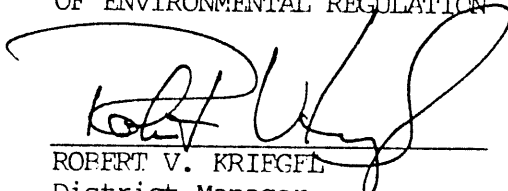
PERMITTEE:
Gulf Power Company

I.D. Number: 1032P37371
Permit/Certification Number: I032-113566
Date of Issue: **MAR 7 1986**
Expiration Date: February 1, 1991

Expiration Date:
February 1, 1991

Issued this 7th day of March,
1986.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



ROBERT V. KRIFGFL
District Manager