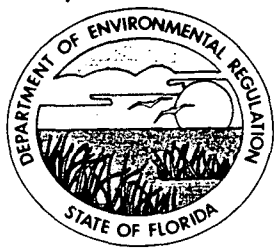


BEST AVAILABLE COPY



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

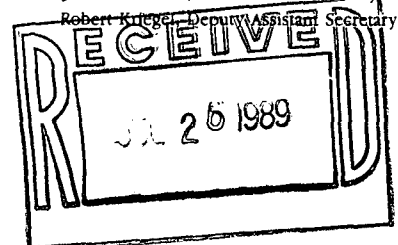
Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Robert Kitzger, Deputy Assistant Secretary

JUL 25 1989



Mr. George Layman
Gulf Power Company
P. O. Box 1151
Pensacola, Florida 32520-1151

FL 000 2283

C/G - I

Dear Mr. Layman:

On July 5, a compliance sampling inspection was conducted at the Scholz Electric Generating Plant wastewater treatment facility. An inspection report is attached for your information. At the time of the inspection, the facility was operating satisfactorily. However, the following minor deficiencies were noted:

1. Samples are not preserved (chemically and at 4°C) immediately upon sample collection;
2. A chain-of-custody record is not being maintained for samples shipped to the contract laboratory; and,
3. There are iron and manganese excursions reported for the May 1989 sampling effort.

Please correct the deficiencies within 15 days receipt of this letter. Also, please investigate and possibly provide an explanation for the iron and manganese excursions.

Thank you and your staff for the cooperation extended to Ms. Karen Brown during the inspection. If you have any questions, please do not hesitate to contact Ms. Karen Brown at (904)436-8380.

Sincerely,

Bob Cooley, P.E.
Program Administrator
Water Facilities

RB/kbw

NPDES Compliance Inspection Report

Section A: National Data System Coding

[illegible]

Section B: Facility Data

Name and Location of Facility Inspected		Entry Time ☒ AM ☐ PM		Permit Effective Date	
Gulf Power Scholz Electric Generating Plant		9:30 7-5-89		11-1-84	
County 271 off U.S. 90		Exit Time/Date		Permit Expiration Date	
Sneads, Florida		12:00 pm 7-5-89		10-31-89	
Name(s) of On-Site Representative(s)		Title(s)		Phone No(s)	
Pat Parker		Plant manager			
Raymond Walden		Laboratory Supervisor			
Mike Oaks		Environmental Affairs Supervisor		444-6429	
Name, Address of Responsible Official		Title			
George Layman					
Gulf Power Company					
P.O. Box 1151		Phone No.		Contacted	
Pensacola, FL 32520-1151		444-6429		☐ Yes ☒ No	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

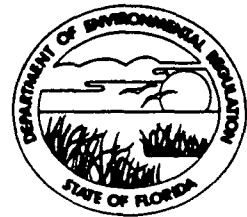
<u>S</u>	Permit	<u>S</u>	Flow Measurement	<u>N</u>	Pretreatment	<u>S</u>	Operations & Maintenance
<u>M</u>	Records/Reports	<u>S</u>	Laboratory	<u>S</u>	Compliance Schedules	<u>N</u>	Sludge Disposal
<u>S</u>	Facility Site Review	<u>S</u>	Effluent/Receiving Waters	<u>S</u>	Self-Monitoring Program		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

On July 5 a compliance sampling inspection was conducted at the Scholz Generating Plant wastewater treatment facility. The facility was given a satisfactory rating.

See attached cover letter and inspection report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Karen J. Brown	DER/Pensacola/436-8380	7-5-89
Signature of Reviewer	Agency/Office	Date
Regulatory Office Use Only		
Action Taken	Date	Compliance Status ☐ Noncompliance ☐ Compliance



Interoffice Memorandum

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

TO: File

THROUGH: Rick Bradburn *RB*

FROM: Karen Brown *KB*

DATE: July 20, 1989

SUBJECT: Compliance Sampling Inspection (CSI) at Gulf Power
Scholz Plant

On July 5, I conducted a CSI at Gulf Power Scholz Plant in Jackson County. The purpose of the inspection was to collect effluent samples, visually inspect the wastewater treatment system and review laboratory records. Gulf Power representatives were Pat Parker, Plant Manager, Raymond Walden, Laboratory Supervisor, and Mike Oaks, Environmental Affairs Specialist.

Samples were collected by Gulf Power personnel. Samples for DER were collected at the main plant discharge, ash pond and sanitary treatment plant. Note, Mike Oaks indicated that outfall 003 does not exist because Gulf Power has not had to discharge metal cleaning wastes. Gulf Power collected samples at the main plant discharge and ash pond. Gulf Power contracts Water Spigot to sample the sanitary treatment plant. Water Spigot sampled the sanitary treatment plant on the same day as the CSI.

Gulf Power properly collected samples in the required containers. However, chemical and refrigeration of the samples is routinely performed in Gulf Power's laboratory.

Gulf Power contracts several laboratories to meet monitoring requirements. Savannah laboratory in Mobile analyzes oil grease, metals and fecal coliform in the effluent samples. Pioneer laboratory samples all monitoring wells and performs all analysis of the well samples except radionuclides. Pioneer Laboratory sub-contracts radionuclide analysis. Water Spigot collects and analyzes the effluent samples at the sanitary treatment plant for biological oxygen demand (BOD) and total

suspended solids (TSS). Gulf Power's laboratory analyzes pH, temperature and total residual chlorine (TRC).

On July 18 in conjunction with the CSI, a laboratory audit was conducted at Pioneer Laboratory in which groundwater monitoring data were reviewed. The audit revealed that records are well maintained and no deficiencies were noted. Data audited included radionuclides from 1985 to present and metals reported for May 1989. All radionuclide data reported in quarterly monitoring reports were verified from Post, Buckley, Schuh and Jernigan, Inc., and Burmah Technical Services reports submitted to Pioneer Laboratory. The metals data were verified from Pioneer Laboratory's bench sheets. Each metals analysis had adequate quality control checks and all analyses were approved Environmental Protection Agency Methods.

During the CSI, each outfall was observed and no deficiencies were noted. Due to the inclement weather, the perimeter of the ash pond was not observed. The inclement weather also caused the catwalk over the discharge canal (main plant discharge outfall 001) to be completely under water. These samples were collected by motor boat.

A composite sample was collected at the ash pond for TSS. The autosampler was started at 7:55 a.m. on July 4 and ended at 8:00 a.m. July 5. The sampler was filled with ice, but had melted by the time of the inspection (10:00 a.m.). The autosampler collects approximately 125 ml of sample every hour.

At the main plant discharge, Gulf Power has discontinued analyzing TRC because they are no longer chlorinating the cooling water. Chlorination is still being performed at the sanitary treatment plant.

DER's sample results indicated that the facility is in compliance with permit limits. Note, parameters routinely analyzed by DER in Tallahassee were not performed because the Tallahassee laboratory is temporarily out of service.

A review of Gulf Power's laboratory records revealed that the laboratory maintains adequate records for pH, temperature and flow measurements. Some sample results were verified from the discharge monitoring reports (DMR).

A deficiency in chain-of-custody records was noted. Chain-of-custody is not maintained to contract laboratories. Without chain-of-custody, sample holding times could not be determined. In my opinion, fecal coliform holding time (6 hours) is probably being exceeded due to the distance between Gulf Power and Savannah Laboratory.

DMRs from July 88 to April 89 were reviewed. No deficiencies were noted except for a fecal coliform exceedance in July 88.

Quarterly groundwater monitoring reports from May 88 to May 89 were reviewed. The May 89 results show exceedances of iron and manganese in most of the wells including the background wells that are significantly higher than the February 89, July 88 and May 88 sample results. Radionuclides data for May 88 (MW 103) and October 87 (MW 105 and MW 110) show exceedances of drinking water standards.

KB:kbm