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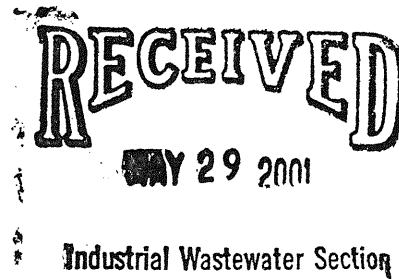


May 24, 2001

Mr. Michael Hatcher, P.E.
Department of Environmental Protection
2600 Blair Stone Road
Mail Station 3545
Tallahassee, Florida 32399-2400

Re: NPDES Permit FL0002283
Scholz Electric Generating Plant

NPDES Permit FL0002275
Crist Electric Generating Plant



Dear Mr. Hatcher:

The Scholz and Crist NPDES Permits list specific analytical methods that must be utilized for the various parameters we are required to report. This purpose of this letter is to request some additional flexibility as to what methods are in the permit. This reason for this request is that from time to time we experience matrix interference (depending of course on the condition of the intake water used for once through cooling) which can result in inaccurate or false analytical reports .

Our laboratory has advised us that it would be wise to have at least two options as to what analytical method may be used so that we can address matrix interference. Attached is a letter from our contract laboratory (Severn Trent Services) which explains which methods we would like to be able to use with certain parameters.

We are not asking for any methods to be removed from the permit list, but rather are asking that one be added (the ICP method 200.7) as an option for copper and lead at Plant Scholz. Similarly, we are requesting that the ICP 200.7 method be allowed as an option for copper, lead and selenium at Plant Crist.

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Please advise as to how best to handle this request. It is by no means a major change, and again, we are not removing any requirements from the permits. The ICP 200.7 method is a FDEP approved method and, as explained in the attached letter, can obtain the required PQL levels for the respective parameters. Thank you for your assistance once again. If you have any questions, please contact me at (850) 444-6127.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Terry".

Rachel Terry
Environmental Affairs Specialist

Attachment



May 3, 2001

Ms. Rachel Terry
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

STL Mobile

Re: Optional analytical method for metal analysis of NPDES
Discharge monitoring at Gulf Power's Scholz and Crist Plants

Dear Rachel,

The current NPDES permit for the Gulf Power Scholz Plant lists the Graphite Furnace Atomic Absorption (GFAA) technique as the only approved method for cadmium (213.2), copper (220.2) and lead (239.2). These analytes have permitted Maximum Contaminate Levels (MCL's) that are hardness dependent. An approved analytical technique must be capable of reporting down to or below the permitted MCL. If no established method can achieve the MCL, then the approved method is that method with the lowest reporting limit/Practical Quantitation Limit (PQL).

The Inductively Coupled Plasma Atomic Emission Spectrometric Method (ICP-AES or ICP) 200.7 is listed in the permit as an approved method for nickel and iron. Method 200.7 can achieve the same approved PQL's listed for both copper (220.2) and lead (239.2) and should be included as an optional analytical technique.

The approved PQL for cadmium (GFAA 213.2) cannot be achieved by the ICP (200.7) method.

Similarly, the Gulf Power Crist Plant permit lists only AA techniques for copper (220.2), lead (239.2) and selenium (270.2 & 270.3) as the approved methods. The approved PQL for each of these analytes can be achieved by the ICP method 200.7 and should be considered as an optional approved technique.

The advantage to adding ICP method 200.7 as an approved method for the indicated analytes is to provide flexibility of having a different technique available to resolve potential matrix interferences that may be present and to provide confirmation analysis (analytical support) by a separate technique.

If you have any questions, please call me @ 334-666-6633.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Nance".

Michael Nance