

Memorandum

Florida Department of

Environmental Protection

To: Bill Evans *Σ 11/24/98*
Through: ~~Mark Sowell~~ *A 20 Nov 98*
From: Vic Hultstrand *Ukt*
Date: November 20, 1998
Subject: Comments Concerning the Draft Permit for the Gulf Power
Scholz Electric Generating Plant

I have reviewed Gulf Power's letter of November 12, 1998 regarding the subject permit, and have the following comments:

1. Item B.: I suggest that Nickel, because it is a common constituent of coal, remain as a parameter to be monitored.
2. Item C. 1. a. beginning with the fifth sentence: "Based on the results of these studies, it has been proven that a natural source of radionuclides is present at both Plant Crist and Smith, and is affecting groundwater." I agree this has been proven at Smith, but not yet at Crist. It has been proven that the clay is a source of radioactivity, but not that it is natural at such high levels.
3. The statement: "The historic concern for the high radiological activity of gross alpha, ^{226}Ra and ^{228}Ra in the shoreline monitoring wells has been resolved as a natural condition along the shoreline, salt water influenced ground water zone. The May 1997, Gulf Power report by LBG-Guyton Associates concludes that the elevated radiological activity is naturally occurring and unrelated to the ash pond." I agree there is naturally occurring radiological material at the Smith facility, but I also believe there is a contribution from the pond as well.
4. I believe the frequency of the radiological monitoring at Plant Scholz can be reduced. It appears that a mechanism (an acidifying zone) for extracting radionuclides from the Ash is not present at Scholz, or at least not where we have looked.

5. Item C.1. b. and C.1. d.: Arsenic, mercury, selenium, lead and chromium are all elements that are found in coal and as such should be included as monitoring parameters. However, it should be all right to reduce the monitoring frequency.

6. Item C.1. c.: No problem with this one. They are usually used interchangeably anyway.