

Memorandum

Florida Department of Environmental Protection

TO: Craig Diltz

FROM: Bill Evans

THROUGH: Bill Schaal

DATE: August 17, 1998

SUBJECT: NWD Comments on Preliminary Draft Permit for Gulf Power Plant Scholz

Cover page and header section of the permit: Recommend deleting Application No. and only use that in the Fact Sheet, and make the Permit Number the full WAFR PA number, FL0002283-001-IW1S, on all pages.

NWD has no objection to deleting the requirement to conduct whole effluent toxicity (WET) testing and the biological integrity testing that was once a year in the State permit. (See attached e-mails from Glenn Butts, NWD biologist dated March 10, 1998.) Please note there are also no WET requirements in the new Lansing Smith permit or in the Current Plant Crist permit.

I.A.1.c.

Related to no WET testing, why does condition I.A.1.c. suggest quarterly toxicity testing when a chlorination program is started? Since there is a numerical standard for TRC and the permit tests for it once a week when there is chlorination, I see no need for WET testing due to chlorination. Therefore, condition I.A.1.c. should be revised.

I would also recommend putting any other conditions regarding chlorination in the permit now, such as you have with TRC testing, rather than having to do a permit revision on short notice as I.A.1.c. would require.

TRC test method: Why are test methods included in both condition I.A.1.b. on page 1 and in I.B. MDL/PQL section? Are the two methods, amperometric titration 4500-C1 D Standard Methods and EPA 330.1, the same?

I.A.1.a. TRC frequency, in the table, should refer to A.1.d., that only requires monitoring when there is chlorination.

Discharge Temperature at EFF-1: The State permit has the sampling point as the discharge canal, EFF-2. Was this a clarification?

I.A.1.d. condition "d." is used twice, the second "d." should be numbered I.A.1.e.

III.C. ZOD description: Recommend deleting the last two sentences that sets forth the minimum criteria and criteria beyond the ZOD. The permit template puts these limits in Section IV (see IV below).

III.H. Ground Water monitoring parameters:

The Department's review of a special Gulf Power Report "Nickel Study For Monitor Well MW-210MD Scholz Electric Generating Plant" dated July 2, 1998 concerning Nickel is currently being reviewed. Reference is made to Vic Hultstrand's July 6, 1998 memorandum and my July 8, 1998 memorandum regarding recommendations of this Nickel report. The following comments may be revised pending that final review. There is also currently a Department review of a special Gulf Power Report regarding radionuclides at Plant Crist, Escambia County. This review may also cause the following comments to be revised pending that final review.

OK NWD recommends deleting two parameters (Gross Beta and Nickel) from and adding two parameters (Arsenic and combined Radium 226 and 228), to the GWMP, see justifications below.

OK NWD recommends that the frequency of monitoring be reduced from quarterly to annually. This is justified by the historical trend of general non-detection of the primary drinking water standards (PDWS) metals and the additional reasonable assurance that the elevated Nickel in MW-210MD is not a result of the Plant operations or the wastewater treatment system and that this is an "existing installation" exempt from secondary drinking water standards (SDWS).

Recommend deleting Gross Beta as Plant Scholz is not a source of man-made beta particle and photon emitter radionuclides as defined in rule 62-550.200(39).

was not monitored at ash pond?
Recommend deleting Nickel as Gulf Power's report "Nickel Study For Monitor Well MW-210MD Scholz Electric Generating Plant" dated July 2, 1998 "provides reasonable assurance that nickel is not of concern in the Ground Water Monitoring Plan for the Scholz Plant and that the elevated levels of nickel in MW-210MD are not violations of ground water criteria. This recommendation does not delete the Ash Pond discharge monitoring requirement for Nickel. Continued monitoring of the Ash Pond discharge will continually provide reasonable assurance that Nickel containing ash (bottom ash at 15 mg/kg and fly ash at 36 mg/kg) does not become a source of Nickel to surface or ground waters.

Recommend adding Arsenic (which is in the preliminary draft but was not in the previous permit).

Recommend adding Radium 226 and 228 using the following protocol.

OK *When Gross Alpha is detected above 3.0 pCi/l then both Radium 226 and 228 shall be tested.*

? This is consistent with the Department's concerns in DEP NWD letter to Gulf Power dated November 14, 1996 regarding Plant Crist. Plant Crist had Radium 228 levels above the MCL of 5 pCi/l when Radium 226 was below the trigger level of 3 pCi/l. Therefore, the past protocol, that was picked up from the Drinking Water Chapter 62-550, is not considered acceptable for IW permitting based upon BPJ.

III.H. parameter table:

OK { Gross Alpha should show the limit 15 pCi/l (excluding radon and uranium) PDWS and not just refer to the rule (62-550.310(4)(a)).

Radium 226 and 228 should show the limit 5 pCi/l (combined) as PDWS (62-550.310(4)(a)).

OK III.O. Recommend deleting the last three sentences. Justification: 62-701 relates to landfills and this permit is not permitting a landfill as the permits do for Plant Smith and Plant Crist. The Radium 226 and 228 protocol is recommended to be revised, see III.H. above.

IV. Section IV is not used, I recommend the following, which is typically in the template permit, if the related condition is removed as recommended from section III.C.:

"IV. *Other Land Application Requirements*

OK 1. *The permittee's discharge to ground water shall not cause a violation of water quality standards for Class G-II ground waters at the boundary of the zone of discharge in accordance with rules 62-520.400 and 62-520.420, 62-520.520(1), F.A.C.. This facility has "existing installation" status and is exempt from compliance with secondary drinking water standards.*

2. *The permittee's discharge to ground water shall not cause a violation of the minimum criteria for ground water specified in rule 62-520.400, F.A.C., within the zone of discharge."*

OK VI.A.1.b. The BMP compliance schedule does not match the Fact Sheet schedule, 6 and 12 months vs. 3 and 6 months respectively.

VII.B. **Duty to Reapply:** The current condition does not recognize the changes in chapter 62-620 that created the Guide to Wastewater Permitting. Recommend condition 2 be replaced with the following condition:

OK "2. *The permittee shall apply on the appropriate form listed in Rule 62-620.910, F.A.C., and in the manner established in Rules 62-620.400 , 62-620.410, F.A.C. and the Department of Environmental Protection Guide to Wastewater Permitting including submittal of the appropriate processing fee set forth in Rule 62-4.050, F.A.C."*

OK VIII. **General Conditions:** Recommend the date on the rule cite, 11-29-94, be changed to the current version, 12-24-96, or delete the date of the rule and only cite the rule.

OK **Signature block:** Update area code to (850).

Fact Sheet:

? Based on the recommend changes to the Ground Water Monitoring Conditions, paragraph 4 of the Fact Sheet needs to state if the radium testing protocol changed and which parameters are deleted.

Memorandum

Florida Department of Environmental Protection

TO: Greg Smith, Water Facilities Compliance and Enforcement Manager

FROM: Bill Evans, IW Permitting Section Supervisor

THROUGH: Vic Hultstrand

DATE: July 8, 1998

SUBJECT: Gulf Power Plant Scholz Re: Compliance with Nickel in Ground Water MW-210MD

Vic Hultstrand's July 6, 1998 memorandum concurs with the results of Gulf Power's Report "Nickel Study For Monitor Well MW-210MD Scholz Electric Generating Plant" dated July 2, 1998, that the Scholz Plant is not the cause of elevated nickel reported in MW-210MD.

Bryan Baker, FDEP Tallahassee Ground Water Section, was also sent a copy of the report and we should await his comments before proceeding.

Provided Bryan Baker's comments do not contradict Vic's concurrence with the report, I recommend that:

1. The Department accept that the July 2 report provides reasonable assurance that nickel is not of concern in the Ground Water Monitoring Plan for the Scholz Plant and that the elevated levels of nickel in MW-210MD are not violations of ground water criteria. The report concludes:
 - that the nickel is naturally occurring at this site,
 - that the elevated nickel in MW-210MD is leached from a nickel laden (7 mg/kg) clay layer above the screened zone,
 - that the resulting nickel in the leachate is not aggravated by the immediate ground water with elevated secondary parameters,
 - that there is elevated nickel in the sediments in the Apalachicola River above the plant,
 - that there is no evidence of a nickel contaminate plume from the ash pond.
2. Our possible enforcement action against Gulf Power, that the elevated nickel levels in MW-210MD may be ground water violations, should be stopped as there is no merit to continue it.
3. That the draft permit be issued without an accompanying order regarding ground water compliance.
4. That the preliminary draft permit's ground water monitoring plan delete the requirement to monitor for nickel in the monitoring wells. That the preliminary draft permit's ash pond discharge be continued to be monitored for nickel to provide continual reasonable assurance that the nickel containing ash (bottom ash at 15 mg/kg and fly ash at 36 mg/kg) does not become a source of nickel to surface or to ground water.
5. That the Department not require any other form of relief from the nickel ground water criteria such as an exemption, rule 62-520.500, or establishing a background level, rule 62-520.420(2), as there does not appear to be a need for continual monitoring for nickel in the ground water at this time.