

One Energy Place
Pensacola, Florida 32520

850.444.6111

November 12, 1998

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



Re: Gulf Power Company
Comments on Draft Permit FL0002283
Scholz Electric Generating Plant

Dear Mr. Hatcher:

The draft of the Scholz NPDES Permit was received on October 14, 1998. A majority of our comments on the previous preliminary draft (submitted April 8, 1998) have been addressed; however, we would appreciate the Department's consideration of the following for inclusion in the final permit:

NO Covered under I.B.2
A. Part I.A1.b. Surface Water Discharges: As mentioned in our comments on the preliminary draft permit, Plant Scholz operates only approximately two to three months a year. Therefore, please add a provision to this section that clarifies monitoring/reporting, for all parameters (including temperature, pH, etc.), is not required during those periods the plant is not operating.

NO
B. Part I.A.2.a. Outfall I-1C Ash Pond Discharge: Nickel has been added as a parameter to be monitored at the ash pond. It should be noted that this was not a requirement listed in the preliminary draft. It is requested that this parameter be deleted from the final permit. The ash pond has been monitored for many years in the past and nickel has never been detected at the outfall (see Attachment A).

NO
Earlier this year, there was a question about nickel in two groundwater monitoring wells at Plant Scholz. In response to this concern, Gulf Power conducted a study into the issue and as stated in a letter dated September 15, 1998, the Department agreed that the nickel in question was not a result of the Scholz Plant site operations. Rather, the source of nickel is from naturally occurring conditions. Therefore, continued surface water monitoring for nickel is not warranted. It should also be noted that in this draft permit, the Department has deleted nickel from the Scholz groundwater monitoring requirements.

C. Part III. Groundwater Monitoring Requirements: The numbered items below address Gulf's comments on the groundwater monitoring portion of this draft permit. Many of these items below have been discussed with the Department's Northwest District office in Pensacola.

OK
1. Section III.H. outlines FDEP's recommended parameter list. There needs to be a change in "units" from Tg/l to mg/L. Nickel has been included in this table. On page 7 of the fact sheet it is stated that "Gross Beta and Nickel were deleted..." Nickel appears to be a typo.

a. Gross Alpha, ²²⁶radium, ²²⁸radium have been left in the sampling list at this site. Gross Alpha has been detected three times above 15 pCi/l. One was the background well MW-205MD, and the other two events were for MW-210S. Confirmation sampling for two previous events have not confirmed the first sampling. The third confirmation (MW-210S) has not been conducted. However, ²²⁶radium and ²²⁸radium are extremely low and are related to the elevated turbidity (65 NTU) and TDS (620 mg/L).

Leachate studies have been conducted at Gulf Power's other two generating plants, Plant's Smith and Crist. 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. In the Plant Crist radionuclide study we subjected the ash to severe pH, agitation and TDS conditions and were unable to leach radium of any significance. When leachate studies were conducted on on-site clays it resulted in extremely high natural levels of these constituents.

At Plant Smith we conducted an extensive search of radionuclides and found that natural clays were again the source of these levels. As a result of our study, FDEP dropped radionuclide sampling from the groundwater monitoring parameters and included the following statement in our last permit (Fact Sheet): "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."

On October 19, 1998 (Attachment B), all wells at Plant Scholz were sampled for gross alpha, gross beta, ^{226}Ra and ^{228}Ra . As illustrated in the results (Attachment C), all wells were within State water quality standards for ^{226}Ra and ^{228}Ra . In reference to gross alpha, all wells with the exception of MW-210S were below the 15 pCi/L standard. Due to the gross alpha analytical method, turbidity and TDS of the water sample affected the results of this well and caused an elevated value (error of ± 9.4 pCi/l). Therefore, all wells are considered to be within acceptable levels for groundwater quality.

No Based on the data that has been compiled over the last 15 years at Plant Scholz and the fact that there have been no confirmed radiological exceedances in any wells at Plant Scholz, continued monitoring of radiologicals is unnecessary and completely unwarranted.

No b. In reference to arsenic, Gulf Power Company (Gulf) suggests that one sampling event should be conducted for this parameter. If all levels are below State water quality standards, then Gulf recommends that the parameter be dropped from further sampling.

OK c. It is suggested that the reference to water level and referenced measurements should reference NGVD instead of MSL. It is also suggested that the reference to mean sea level in III.I. should be changed to feet NGVD.

Sampling was reduced from Qtr to yearly.
d. The groundwater summary report, issued to the Department in March 1997, summarized the groundwater quality for all wells on-site. Metals such as mercury, selenium, lead and chromium have never had a confirmed groundwater exceedance. These metals have been sampled for many years and the historical data provides reasonable assurance that there is not a problem related to these constituents, after an operational history of approximately 45 years.

OK 2. Item III.K. indicates that new wells should be installed as we have in the past. No new wells are required at this time. Therefore, this requirement should be eliminated.

OK 3. Item III.L. states that all wells should be surveyed. This task has already been completed and therefore should be deleted from the permit.

Mr. Michael Hatcher, P.E.
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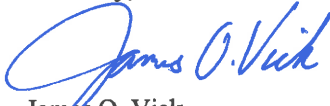
4. Item III.P. requires a written technical report be prepared and be submitted to the Department at permit renewal. It is suggested that this condition be re-written as follows: "At permit renewal (5 years from this permit issuance), a written technical report..."

5. Part III.M. As requested in our previous comments, please modify the requirement to collect daily rainfall data to four weeks before and on the day of sample collection. This information will be submitted with the annual monitoring report.

For the reasons previously discussed at meetings among Gulf and Department personnel and as set forth in this letter, Gulf believes that its comments and suggested permit revisions are reasonable and warranted. We hope that the Department will agree and will incorporate appropriate modifications to the permit before it is finally issued. However, in the event that the Department elects not to do so, Gulf reserves and maintains its opportunity and rights as provided under applicable law and Department rule to contest, seek to modify or amend, or otherwise oppose those objectionable provisions and conditions which may be included in the final permit. Those Gulf Power reservations and rights may be exercised either at the time of permit or at an appropriate time or period in the future.

We request consideration of these comments and we look forward to continue working with the Department to finalize this permit. If you have any questions, please contact me at 850.444.6311 or Mike Markey at 850.444.6573.

Sincerely,



James O. Vick
Manager of Environmental Affairs

Cc: FDEP-Northwest District
Bill Evans

Gulf Power Company
Lewis Jeffers
Mike Markey
Kenton Peacock
Joe Neese
Rachel Terry

Hopping Green Sams & Smith
William Preston

ATTACHMENT A

Sample Date	Intake	Plant Ashpond	Plant Discharge
January 1990	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
April 1990	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
July 1990	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
October 1990	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
January 1991	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
April 1991	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
July 1991	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
October 1991	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
January 1992	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
April 1992	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
July 1992	<0.020 mg/l	NS	<0.020 mg/l
October 1992	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
July 1993	<0.020 mg/l	NS	<0.020 mg/l
July 1994	<0.020 mg/l	NS	<0.020 mg/l
July 1995	<0.020 mg/l	NS	<0.020 mg/l
July 1996	<0.020 mg/l	NS	<0.020 mg/l
January 1997*	<0.020 mg/l	<0.020 mg/l	<0.020 mg/l
July 1997	<0.020 mg/l	NS	<0.020 mg/l
June 1998	NS	NS	<0.040 mg/l

* = Sampling event for permit renewal

ATTACHMENT B
(GROUNDWATER SAMPLING EVENT 10-19-98)

Well	Gross Alpha	Gross Beta	Radium 226	Radium 228
Units	pCi/l	pCi/l	pCi/l	PCi/l
MW-203S	1.3+/-0.5	2.5+/-0.4	1.3+/-0.7	1.0+/-0.7
MW-203MD	0.5+/-0.4	1.1+/-0.4	0.8+/-0.6	0.3+/-0.6
MW-204S	2.4+/-0.6	8.4+/-0.6	1.3+/-0.7	1.4+/-0.8
MW-204MD	0.6+/-0.3	2.4+/-0.4	0.1+/-0.4	2.1+/-0.8
MW-205S	0.0+/-0.2	0.3+/-0.3	0.8+/-0.6	0.9+/-0.7
MW-205MD	2.4+/-0.9	7.3+/-0.5	2.8+/-0.6	0.0+/-0.6
MW-210S	19.1+/-9.4	14.6+/-4.0	0.9+/-0.6	0.4+/-0.7
MW-210MD	3.7+/-1.3	7.9+/-0.6	1.6+/-0.7	0.5+/-0.7
MW-212MD	0.2+/-0.3	0.9+/-0.4	0.6+/-0.5	0.3+/-0.7
WSW-2	0.0+/-0.3	0.8+/-0.4	0.3+/-0.4	1.1+/-0.8
Lab Blank	0.2+/-0.1	0.2+/-0.1	0.5+/-0.3	0.6+/-0.7
Equip. Blnk.	0.0+/-0.2	0.0+/-0.3	0.4+/-0.5	0.4+/-0.6

Equip. Blnk. = Equipment Blank

ATTACHMENT C
LABORATORY SUMMARY SHEETS
FOR THE 10-19-98 SAMPLING EVENT

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LOG NO: M8-25415A
Received: 26 OCT 98
Reported: 10 NOV 98

Mr. Joe Neese
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Project: Scholz Quarterly
Sampled By: Brian Kittrell/Tim Ashley
Code: 121281111

REPORT OF RESULTS

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LOG NO	SAMPLE DESCRIPTION , LIQUID SAMPLES	DATE/ TIME SAMPLED			
25415A-1	Scholz MW-203S	10-19-98/1521			
25415A-2	Scholz MW-203MD	10-19-98/1527			
25415A-3	Scholz MW-204S	10-19-98/1629			
25415A-4	Scholz MW-204MD	10-19-98/1626			
25415A-5	Scholz MW-205S	10-19-98/1705			
PARAMETER	25415A-1	25415A-2	25415A-3	25415A-4	25415A-5
Total Radium 226, pCi/l	1.3+/-0.7	0.8+/-0.6	1.3+/-0.7	0.1+/-0.4	0.8+/-0.6
Analysis Date	11.04.98	11.04.98	11.04.98	11.04.98	11.04.98
Total Radium 228, pCi/l	1.0+/-0.7	0.3+/-0.6	1.4+/-0.8	2.1+/-0.8	0.9+/-0.7
Analysis Date	11.02.98	11.02.98	11.02.98	11.02.98	11.02.98

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LOG NO	SAMPLE DESCRIPTION , LIQUID SAMPLES	DATE/ TIME SAMPLED			
25415A-6	Scholz MW-205MD	10-19-98/1704			
25415A-7	Scholz MW-210S	10-19-98/1820			
25415A-8	Scholz MW-210MD	10-19-98/1745			
25415A-9	Scholz MW-212MD	10-19-98/1557			
25415A-10	Scholz WSW-2	10 19-98/1416			
PARAMETER	25415A-6	25415A-7	25415A-8	25415A-9	25415A-10
Total Radium 226, pCi/l	2.8+/-0.6	0.9+/-0.6	1.6+/-0.7	0.6+/-0.5	0.3+/-0.4
Analysis Date	11.04.98	11.04.98	11.04.98	11.04.98	11.04.98
Total Radium 228, pCi/l	0.0+/-0.6	0.4+/-0.7	0.5+/-0.7	0.3+/-0.7	1.1+/-0.8
Analysis Date	11.02.98	11.02.98	11.02.98	11.02.98	11.02.98

REFERENCE: EPA 40 CFR Part 136
Savannah Laboratories Florida DHRS Certification No. E87089 and DEP CQAP
No. 890142G.

Radiological analysis subcontracted to KNI, DHRS certification No. E84025.

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LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR LIQUID SAMPLES	DATE/ TIME SAMPLED			
25415A-11	Laboratory Blank				
25415A-12	Equipment Blank				
25415A-13	Lab Control Standard % Recovery				
25415A-14	Precision (%RPD) of LCS/LCSD				
PARAMETER	25415A-11	25415A-12	25415A-13	25415A-14	
Total Radium 226, pCi/l	0.5+/-0.3	0.4+/-0.5	104 %	41 %	
Analysis Date	11.04.98	11.06.98	---	---	
Total Radium 228, pCi/l	0.6+/-0.7	0.4+/-0.6	87 %	0 %	
Analysis Date	11.02.98	11.02.98	---	---	

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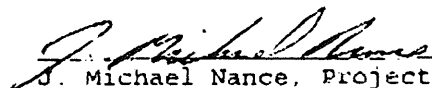
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REPORT OF RESULTS

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LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR LIQUID SAMPLES	DATE/ TIME SAMPLED			
25415A-15	Detection Limit				
25415A-16	Analysis Method				
25415A-17	Date Analyzed/Time Analyzed				
PARAMETER		25415A-15	25415A-16	25415A-17	
Total Radium 226, pCi/l		0.0	903.0	11.04.98	
Total Radium 228, pCi/l		0.0	EERF Ra-05	11.02.98	


J. Michael Nance, Project Manager

Final Page Of Report

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REPORT OF RESULTS

LOG NO	SAMPLE DESCRIPTION , LIQUID SAMPLES	DATE/ TIME SAMPLED			
25415-1	Scholz MW-203S	10-19-98/1521			
25415-2	Scholz MW-203MD	10-19-98/1527			
25415-3	Scholz MW-204S	10-19-98/1629			
25415-4	Scholz MW-204MD	10-19-98/1626			
25415-5	Scholz MW-205S	10-19-98/1705			
PARAMETER	25415-1	25415-2	25415-3	25415-4	25415-5
Cadmium (200.7), mg/l	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Chromium (200.7), mg/l	<0.010	<0.010	<0.010	<0.010	<0.010
Chloride (325.2), mg/l	6.0	5.2	8.6	3.8	3.9
Iron (200.7), mg/l	19	1.9	11	0.23	0.18
Manganese (200.7), mg/l	3.3	1.2	1.6	<0.010	<0.010
Sulfate (SM 4500D), mg/l	35	39	95	6.6	<5.0
Total Dissolved Solids (160.1), mg/l	200	250	320	170	49
Field pH, units	6.0	6.4	6.7	8.0	6.0
Aluminum (200.7), mg/l	<0.20	<0.20	0.28	0.45	<0.20
Nickel (200.7), mg/l	<0.040	<0.040	<0.040	<0.040	<0.040
Lead (200.7), mg/l	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Mercury (245.1), mg/l	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020
Selenium (200.7), mg/l	<0.010	<0.010	<0.010	<0.010	<0.010
Gross Alpha, pCi/l	1.3+/-0.5	0.5+/-0.4	2.4+/-0.6	0.6+/-0.3	0.0+/-0.2
Analysis Date	10.31.98	10.31.98	10.31.98	10.31.98	10.31.98
Gross Beta, pCi/l	2.5+/-0.4	1.1+/-0.4	8.4+/-0.6	2.4+/-0.4	0.3+/-0.3
Analysis Date	10.31.98	10.31.98	10.31.98	10.31.98	10.31.98
Specific Conductance (Taken in Field), umhos/cm	440	410	500	230	20
Turbidity (taken in field) (180.1), NTU	5.0	2.8	6.1	58	1.0
Depth to Groundwater from T.O.C. (EPASOP), ft.	10.22	16.05	9.93	58.71	10.33

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25415-2	Scholz MW-203MD	10-19-98/1527			
25415-3	Scholz MW-204S	10-19-98/1629			
25415-4	Scholz MW-204MD	10-19-98/1626			
25415-5	Scholz MW-205S	10-19-98/1705			
PARAMETER	25415-1	25415-2	25415-3	25415-4	25415-5
Water Elevation (ft. above NGVD), ft.	52.56	47.08	97.96	49.30	123.92

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25415-7	Scholz MW-210S					10-19-98/1820
25415-8	Scholz MW-210MD					10-19-98/1745
25415-9	Scholz MW-212MD					10-19-98/1557
25415-10	Scholz WSW-2					10-19-98/1416
PARAMETER	25415-6	25415-7	25415-8	25415-9	25415-10	
Cadmium (200.7), mg/l	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	
Chromium (200.7), mg/l	0.014	<0.010	<0.010	<0.010	<0.010	
Chloride (325.2), mg/l	2.6	6.1	17	5.2	10	
Iron (200.7), mg/l	0.66	4.3	57	0.16	<0.050	
Manganese (200.7), mg/l	0.026	1.5	1.6	<0.010	<0.010	
Sulfate (SM 4500D), mg/l	<5.0	83	1100	26	<5.0	
Total Dissolved Solids (160.1), mg/l	120	620	1700	220	150	
Field pH, units	10.7	7.3	6.5	7.2	7.9	
Aluminum (200.7), mg/l	1.9	1.8	<0.20	<0.20	1.4	
Nickel (200.7), mg/l	<0.040	<0.040	0.13	<0.040	<0.040	
Lead (200.7), mg/l	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	
Mercury (245.1), mg/l	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	
Selenium (200.7), mg/l	<0.010	<0.010	<0.010	<0.010	<0.010	
Gross Alpha, pCi/l	2.4+/-0.9	19.1+/-9.4	3.7+/-1.3	0.2+/-0.3	0.0+/-0.3	
Analysis Date	11.06.98	11.03.98	10.31.98	11.01.98	11.01.98	
Gross Beta, pCi/l	7.3+/-0.5	14.6+/-4.0	7.9+/-0.6	0.9+/-0.4	0.8+/-0.4	
Analysis Date	10.31.98	11.03.98	10.31.98	11.01.98	11.01.98	
Specific Conductance (Taken in Field), umhos/cm	260	800	1600	320	250	
Turbidity (taken in field) (180.1), NTU	46	65	17	11	0.88	
Depth to Groundwater from T.O.C. (EPASOP), ft.	77.72	10.55	47.83	26.40	NA	

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25415-7		Scholz MW-210S		10-19-98/1820		
25415-8		Scholz MW-210MD		10-19-98/1745		
25415-9		Scholz MW-212MD		10-19-98/1557		
25415-10		Scholz WSW-2		10-19-98/1416		
PARAMETER		25415-6	25415-7	25415-8	25415-9	25415-10
Water Elevation (ft. above NGVD), ft.		57.34	82.05	46.59	48.60	NA

REFERENCE: EPA 40 CFR Part 136
Savannah Laboratories Florida DHRs Certification No. E87089 and DEP CQAP
No. 890142G.

Radiological analysis subcontracted to KNL DHRs certification No. E84025.

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LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR LIQUID SAMPLES	DATE/ TIME SAMPLED		
25415-11	Laboratory Blank			
25415-12	Equipment Blank			
25415-13	Accuracy			
25415-14	Precision			
PARAMETER	25415-11	25415-12	25415-13	25415-14
Cadmium (200.7), mg/l	<0.0050	<0.0050	98 %	1.0 %
Chromium (200.7), mg/l	<0.010	<0.010	101 %	1.0 %
Chloride (325.2), mg/l	<1.0	<1.0	90 %	1.1 %
Iron (200.7), mg/l	<0.050	<0.050	100 %	4.1 %
Manganese (200.7), mg/l	<0.010	<0.010	101 %	1.9 %
Sulfate (SM 4500D), mg/l	<5.0	<5.0	100 %	3.0 %
Total Dissolved Solids (160.1), mg/l	<5.0	<5.0	98 %	1.0 %
Aluminum (200.7), mg/l	<0.20	<0.20	104 %	3.9 %
Nickel (200.7), mg/l	<0.040	<0.040	97 %	2.0 %
Lead (200.7), mg/l	<0.0050	<0.0050	98 %	2.0 %
Mercury (245.1), mg/l	<0.00020	<0.00020	94 %	1.1 %
Selenium (200.7), mg/l	<0.010	<0.010	94 %	1.1 %
Gross Alpha, pCi/l	0.2+/-0.1	0.0+/-0.2	94 %	6.2 %
Analysis Date	11.03.98	11.01.98	- -	---
Gross Beta, pCi/l	0.2+/-0.1	0.0+/-0.3	105 %	0.4 %
Analysis Date	11.03.98	11.01.98	---	---

SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.

900 Lakeside Drive • Mobile, Alabama 36693-5118 • (334) 666-6633 • Fax (334) 666-6696

LOG NO: M8-25415
Received: 21 OCT 98
Reported: 10 NOV 98

Mr. Joe Neese
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Project: Scholz Quarterly
Sampled By: Brian Kittrell/Tim Ashley
Code: 121081111

REPORT OF RESULTS

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LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR LIQUID SAMPLES	DATE/ TIME SAMPLED
25415-15	Detection Limit	
25415-16	Analysis Method	
25415-17	Date Analyzed/Time Analyzed	
PARAMETER	25415-15	25415-16 25415-17
Cadmium (200.7), mg/l	0.0050	200.7 10.22/1515
Chromium (200.7), mg/l	0.010	200.7 10.22/1515
Chloride (325.2), mg/l	1.0	325.2 10.21/1244
Iron (200.7), mg/l	0.050	200.7 10.22/1515
Manganese (200.7), mg/l	0.010	200.7 10.22/1515
Sulfate (SM 4500D), mg/l	5.0	EPA375.3 10.27/1300
Total Dissolved Solids (160.1)	5.0	160.1 10.22/1600
Aluminum (200.7), mg/l	0.20	200.7 10.22/1515
Nickel (200.7), mg/l	0.040	200.7 10.22/1515
Lead (200.7), mg/l	0.0050	200.7 10.22/1515
Mercury (245.1), mg/l	0.00020	3112B 11.03/1516
Selenium (200.7), mg/l	0.010	200.7 10.22/1515
Gross Alpha,	0.0	900.0 11.03.98
Gross Beta, pCi/l	0.0	900.0 11.03.98

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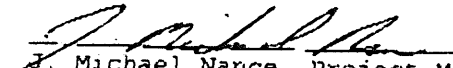
LOG NO: MR-25415
Received: 21 OCT 98
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Mr. Joe Neese
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Project: Scholz Quarterly
Sampled By: Brian Kittrell/Tim Ashley
Code: 121081111
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REPORT OF RESULTS

LOG NO	SAMPLE DESCRIPTION , LIQUID SAMPLES	DATE/ TIME SAMPLED		
25415-18	MW-103			
25415-19	MW-105			
25415-20	MW-110A			
25415-21	MW-112			
PARAMETER	25415-18	25415-19	25415-20	25415-21
Depth to Groundwater from T.O.C. (EPASOP), ft.	13.04	78.00	47.48	14.98


J. Michael Nance, Project Manager

Final Page Of Report