

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

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APR 13 1998

Industrial Wastewater Section



April 8, 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:

Below are our comments on the draft permit that was received March 9, 1998:

1) Permit Fact Sheet: The correct address for the facility is as follows:

OK Scholz Electric Generating Plant
1460 Gulf Power Road
Jackson County
Sneads, Florida 32460

2) Fact Sheet Section 1B. Description of Applicant's Operation: Coal is the main fuel
OK used at Plant Scholz. Please add to this description the fact that #2 diesel is used for unit start up.

3) Fact Sheet Section 1C. Production Capacity of Facility: The actual nameplate rating
OK of the two coal fired units at Scholz is 80 megawatts (MW); however, gross generation is 98 MW.

4) Fact Sheet Section 1G. Outfall 101A – Domestic Wastewater Treatment Plant: A
OK typographical error was noted in the spelling of "dechlorination" in the second sentence.

860-444-6217

- 5) Fact Sheet Section 2. Proposed Effluent Limitations: This section contains proposed limitations for 10 metals, gross alpha and radium 226&228 that are to be monitored at Outfall D001. Over 20 years worth of monitoring data exists for this outfall at Plant Scholz. In all of those years of monitoring, the metals listed in the table of Fact Sheet Section 2 have never been a compliance problem. In addition, the State of Florida has required monitoring for radionuclides at this outfall for many years and there has never been a compliance issue with this parameter.

?
Ask
Bill

Therefore, based on historical compliance, it is requested that monitoring for metals and radionuclides be deleted from the permit. The operation of Plant Scholz has not changed since it began in the mid-1950s nor are there any changes planned in the foreseeable future. The 20 plus years of data accumulated to date should be adequate to justify removing the requirement for metals and radionuclides.

- 6) Fact Sheet Section 4. Ground Water Monitoring Requirements: This section states that the groundwater monitoring requirements and conditions are identical to the ones in the previous state permit. However, it should be noted that this comment does not take into account the report entitled "Groundwater Summary Report" which was submitted by Gulf Power Company to the department along with the renewal application for the Scholz NPDES Permit on March 27, 1997.

OK

OK
reduced
to yearly

This report, which was required by the current Scholz Industrial Wastewater Permit, contained recommendations for the reduction of groundwater monitoring. There are many years of quarterly groundwater monitoring data at Plant Scholz which have not indicated a compliance issue. Therefore, as explained in our summary report, historical compliance should justify our request for a reduction in the number of parameters as well as the monitoring frequency.

- 7) Permit Cover Sheet: Please correct the facility address as follows:
Scholz Electric Generating Plant
1460 Gulf Power Road
Jackson County
Sneads, Florida 32460

OK

- 8) Part I.A.1a. Surface Water Discharges: As stated in paragraph 5 above, there is over 20 years worth of surface water monitoring data for this plant which has not indicated any compliance problems with the ten listed metals. There have not been any problems with radionuclides, either. Based on historical compliance, we request that metals and radionuclide monitoring be deleted from Outfall D001. The operation of the facility has not changed and is not expected to change in the foreseeable future. Surely we have enough data to provide justification for this request.

Ask ?
Bill

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What about other parameters?
It should also be noted that Plant Scholz operates or is "on-line" only approximately two to three months a calendar year. Therefore, please add a provision to the permit that states it is not necessary to monitor and report intake and discharge temperatures when the plant is off line.

OK
9) Part I.A.1.b. Surface Water Discharges: Please modify the first sentence in this paragraph to read: "TRC means the value obtained using the amperometric titration method **or the DPD colorimetric method** for total residual chlorine." The DPD method is listed in Section 4500-Cl G in Standard Methods and is the method currently in use at the plant. It would be an added expense to purchase the equipment necessary for the amperometric method. As you are aware, Plant Scholz does not currently chlorinate once through cooling water but wishes to retain permit authorization to do so.

*OK
2-3 m./yr.
operation.*
10) Part I.A.1.c. Surface Water Discharges: This section contains a requirement for notification to the Department prior to the initiation of chlorination. It also requires quarterly toxicity tests during chlorination. The justification for this requirement is questionable. Due to the fact that there is already an effluent limitation in place for chlorine at Outfall D001, we request that this section be deleted from the permit.

OK
→ 11) Part I.A.4. Outfall 101A Domestic Wastewater Treatment Plant Effluent: We request that the measurement frequency for flow be changed to once per week. The domestic plant at Scholz serves a small number of employees (a total of 30 employees for all three shifts) and the volume of treated effluent from the plant to the ash pond remains relatively constant.

OK
12) Part I.B.13. Other Limitations and Monitoring and Reporting Requirements: This paragraph involves a requirement to certify the ash pond detention volume based on a physical survey of the pond. Please note that such a physical survey was conducted in April 1997 and a report, with a summary of the calculations, was submitted to Mr. Craig Diltz of your office last December.

Due to the fact that we have just completed a physical survey of the pond, please change the date when a physical survey will again be required to the next permit renewal date, which at this time should be 2003. We will of course, continue to provide the annual detention volume certifications based on the amount of flows going to the pond.

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- Delete*
- 13) Part II. Industrial Sludge Management Requirements: Please modify the sentence in this part to read: *applicable Department rules and regulations.* *Delete* "The disposal of sludge or other solids . . . in accordance with the requirements of Chapter 62-701, F.A.C. **except as modified by the report entitled "Evaluation of Solid Waste Management Practices and Requirements for the Florida Electric Utility Industry".**

X Several years ago, Gulf Power Company, through the Florida Electric Power Coordinating Group, Inc. (FCG) submitted the above referenced report to the Department in order to request "alternate industrial waste disposal requirements" as provided by Chapter 62-701.720(3), F.A.C. Subsequent to that request, the FCG received the Department's determination that the provisions of Chapter 62-701.720(1), F.A.C. (Class I landfill standards) shall not apply to electric utilities.

- 14) Part III. Groundwater Monitoring Requirements: As previously stated in paragraph 6 of this letter, the proposed groundwater monitoring requirements do not take into account the "Groundwater Summary Report" that was submitted to the Department by Gulf Power with the permit renewal application in March 1997. Plant Scholz has operated over thirty years with no evident impact. At the current time, it is in operation only two months per year. Based on historical compliance, we request the sampling frequency of the groundwater network be reduced to annually. *OK*

To date, the only parameters to show up above State Water Quality Standards are nickel and cadmium. The nickel appears to be related to natural causes and cadmium has only been detected once, in the January 1998 sampling event, and then it was only slightly over the water quality standard. A confirmation resampling event has been scheduled.

- OK* 15) Part III.C. Groundwater Monitoring Requirements: This paragraph contains a reference to Rule 62-520.420, F.A.C. Just for clarification, as an existing facility Plant Scholz is exempt from secondary standards.

- see Dist. comments* 16) Part III.H.: This section lists the proposed parameters for groundwater monitoring. Again, based on historical compliance, as described in the "Groundwater Summary Report", cadmium, selenium, mercury, radionuclides and lead should be deleted from the monitoring parameters.

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Justification for this request is based on data collected from August 3, 1994 through January 27, 1998. Cadmium has been sampled 149 times in the monitoring network and has been detected only once. A confirmation resampling has been scheduled. Mercury has been sampled 148 times with no exceedances (with only three events over the detection limit of 0.00020 mg/l) and no monitoring wells have been close to the groundwater standard. Selenium has been sampled 148 times with one event over the detection limit of 0.0020 mg/l. Gross alpha and gross beta have been sampled 150 and 132 times respectively and there has been no exceedances for radionuclides during the permit period. Finally, in regards to lead, 149 analyses have been conducted and no confirmed exceedances have been observed. Based on a review of this data, it is requested that the above parameters be deleted from the sampling at Plant Scholz.

Note: A typographical error was noted in the table under paragraph H, please change "Tg/l" to "mg/l".

17) Part III.L.: Section L indicates that well locations shall be reported in accordance with Rule 62-701.510(3)(d)1, F.A.C. Please note it is our standard procedure to have a new well surveyed by a registered Florida land surveyor and report the coordinates. However, the reference to Rule 701, F.A.C. and its applicability to this facility may be misconstrued. Therefore, please remove the reference to Rule 701 in this section.

18) Part III.M.: Due to the fact that Plant Scholz is on-line only about two months per year, it is requested that the requirement to collect daily rainfall data be reduced to five times per week and only during times of plant operation. This should be adequate to provide the information necessary for the groundwater technical report that will be submitted with the next permit renewal application.

It is also noted in this section that "annual monitoring reports" are referred to. I believe this is a typographical error as the only report the rainfall data will be needed for is the groundwater monitoring technical (trends) report that Gulf is required to submit upon permit renewal. Please clarify this item.

19) Part III.O.: This section discusses the procedure that is required should a violation of applicable groundwater standards occur. Please modify the third sentence as follows: "Upon notification by the Department, permittee shall initiate assessment and, if needed, corrective actions". This is simply to clarify that corrective actions may not always be necessary, instead there may simply have been a sampling error or possibly laboratory error involved.

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20) Part III.Q: Also in this section is a reference to a radionuclide screening level of 5 pCi/l. As mentioned previously, based on all of the data collected to date from this facility, continued radionuclide sampling and analysis is not warranted at this facility. It is requested that the reference in this section be deleted.

We request consideration of these comments for incorporation into the final permit. If you have any questions, please contact me at 850.444.6311 or Rachel Terry at 850.444.6127.

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