

One Energy Place  
Pensacola, Florida 32520

Tel 850.444.6111

December 22, 2004



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

**Re: Ash Pond Certification for Plant Scholz (NPDES Permit FL0002283)**

Dear Mr. Hubbard:

This letter serves to certify that, as required by Condition I.B.11 of the above referenced permit, the Plant Scholz ash pond dike and toe areas were periodically inspected in 2004 for structural integrity. There were no breaches or structural defects observed that resulted in a discharge to surface waters of the United States.

Additionally, as required by Condition I.B.13, this letter serves to certify that the ash pond provides the necessary minimum wet weather detention volume to contain the combined volume for all direct rainfall and all rainfall runoff to the pond resulting from the 10-year, 24-hour rainfall event and maximum dry weather plant waste flows which could occur during a 24-hour period. Using data from an ash pond physical survey conducted in February and April 2003, attached are the calculations for the current available detention volume. Based on these numbers, there is currently buffer space of 10,222 cubic yards available in the pond beyond the minimum required for 2005.

If you have any questions or need additional information, please contact Mike Kyhos at (850) 444-6144.

Sincerely,

A handwritten signature in dark ink, appearing to read "James O. Vick".

James O. Vick  
Environmental Affairs Director

Cc: Kenny Peacock  
Warren O'Shields  
Mike Markey  
Mike Kyhos

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Industrial Wastewater  
Section

### Scholz 2005 Ash Pond Certification

|     |                                                                                                                                                              |                                                   |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| I.  | Available Volume based on February and April 2003 Ash Pond Physical Survey                                                                                   | 82,149 yd <sup>3</sup>                            |
| II  | Minus Total Ash to Pond in 2003:<br>(178630 tons coal)(9.13% ash)(2000 lbs/ton)<br>(ft <sup>3</sup> /80 lbs)(yd <sup>3</sup> /27 ft <sup>3</sup> )           | 15,101 yd <sup>3</sup>                            |
| III | Minus Total Ash to Pond in 2004:<br>(216,976 tons coal) (10.12% ash*)(2000 lbs/ton)<br>(ft <sup>3</sup> /80 lbs)(yd <sup>3</sup> /27 ft <sup>3</sup> )       | 20,331 yd <sup>3</sup>                            |
| IV  | Plus Total Ash Removed from Pond<br>December 2003 – January 2004                                                                                             | 37,459 yd <sup>3</sup>                            |
| VI  | Total Detention Volume Available 2005:                                                                                                                       | 84,176 yd <sup>3</sup>                            |
| VI  | Total Detention Volume Required for Certifying<br>Pond in 2005:                                                                                              |                                                   |
|     | 1. Total Projected Ash to Pond in 2005:<br>(225,000 tons coal)(10.12% ash*)(2000 lbs/ton)<br>(ft <sup>3</sup> /80 lbs)(yd <sup>3</sup> /27 ft <sup>3</sup> ) | 21,083 yd <sup>3</sup>                            |
|     | 2. 24 hour wet and dry weather flows to ash pond:<br>(From 1992 NPDES permit)                                                                                | $\frac{52,871 \text{ yd}^3}{73,954 \text{ yd}^3}$ |
| VII | Remaining Detention Buffer Area in Pond:<br>(84,176 yd <sup>3</sup> ) – (73,954 yd <sup>3</sup> )                                                            | 10,222 yd <sup>3</sup>                            |

\* Ash content is an estimated average based on 2004 data