

December 27, 2005



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.E.12 of the above referenced permit, the Plant Scholz ash pond dike and toe areas were periodically inspected in 2005 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.E.15, 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 will be a buffer space of 56,887 cubic yards available in the pond beyond the minimum required for 2006.

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

Sincerely,

James O. Vick
Environmental Affairs Director

Cc: Kenny Peacock
Mike Markey
Mike Kyhos

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Industrial Wastewater
Section

Scholz 2006 Ash Pond Certification

I	Available Volume based on February and April 2003 Ash Pond Physical Survey	82,149 yd ³
II	Minus Total Ash to Pond in 2003: (178630 tons coal)(9.13% ash)(2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	15,101 yd ³
III	Minus Total Ash to Pond in 2004: (216,976 tons coal) (10.12% ash*)(2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	20,331 yd ³
IV	Minus Total Ash to Pond in 2005: (192,335 tons coal) (12.81% ash**) (2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	22,806 yd ³
V	Plus Total Ash Removed from Pond December 2003 – January 2004	37,459 yd ³
VI	Plus Total Ash Removed from Pond November 2005- February 2006	75,000 yd ³
VII	Total Detention Volume Available 2006:	136,370 yd ³
VIII	Total Detention Volume Required for Certifying Pond in 2006:	
	1. Total Projected Ash to Pond in 2006: (224,364 tons coal)(12.81% ash**)(2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	26,612 yd ³
	2. 24 hour wet and dry weather flows to ash pond: (From 1992 NPDES permit)	<u>52,871 yd³</u> 79,483 yd ³
IX	Remaining Detention Buffer Area in Pond: (136,370 yd ³) – (79,483 yd ³)	56,887 yd ³

* Ash content is a calculated average based on 2004 data

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