

December 20, 2007

Mr. Marc Harris
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station 3545
Tallahassee, FL 32399-2400



CERTIFIED MAIL - #7006 2150 0000 9239 1681

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

Dear Mr. Harris:

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 2007 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 60,443 cubic yards available in the pond beyond the minimum required for 2008.

If you have any questions or need additional information, please contact Ms. Susan Kennedy at (850) 444-6153.

Sincerely,

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

James O. Vick
Environmental Affairs Director

Cc: Kenny Peacock – Plant Scholz
Mike Markey – Gulf Environmental

Scholz 2008 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: (178,630 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)	22,813 yd ³
V.	Minus Total Ash to Pond in 2006 (140,866 tons coal) (12.82% ash*) (2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	16,721 yd ³
VI.	Minus Total Ash to Pond in 2007 (214,639 tons coal) (12.02% ash*) (2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	23,889 yd ³
VII	Plus Total Ash Removed from Pond December 2003 – January 2004	37,459 yd ³
VIII	Plus Total Ash Removed from Pond November 2005- February 2006	75,000 yd ³
IX.	Plus Total Ash Removed from Pond December 2006-January 2007	36,349 yd ³
X.	Total Detention Volume Available 2008:	132,102 yd ³
XI.	Total Detention Volume Required for Certifying Pond in 2008:	
	1. Total Projected Ash to Pond in 2008: (170,509 tons coal)(11.90% ash**)(2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	18,788 yd ³
	2. 24 hour wet and dry weather flows to ash pond: (From 1992 NPDES permit)	<u>52,871 yd³</u> 71,659 yd ³
XII.	Remaining Detention Buffer Area in Pond: (132,102 yd ³) – (71,659 yd ³)	60,443 yd³

* Ash content is a calculated average based on corresponding year's data
 ** Ash content is a projected average based on projected coal burn