

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

Industrial Wastewater
Section

DEC 23 2008

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December 17, 2007

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

CERTIFIED MAIL - #7008 1830 0002 2587 7105

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 2008 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 71,396 cubic yards available in the pond beyond the minimum required for 2009.

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

Sincerely,

A blue ink signature of James O. Vick, written in a cursive style.

James O. Vick
Environmental Affairs Director

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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.	Minus Total Ash to Pond in 2008 (73,176 tons coal) (10.95% ash*) (2000 lbs/ton) (ft ³ /80lbs)(yd ³ /27ft ³)	7,419 yd ³
VIII	Plus Total Ash Removed from Pond December 2003 – January 2004	37,459 yd ³
IX.	Plus Total Ash Removed from Pond November 2005- February 2006	75,000 yd ³
X.	Plus Total Ash Removed from Pond December 2006-January 2007	36,349 yd ³
XI.	Plus Total Ash Removed from Pond May 2008-June 2008	12,500 yd ³
XII.	Total Detention Volume Available 2008:	137,183 yd ³
XIII.	Total Detention Volume Required for Certifying Pond in 2008:	
	1. Total Projected Ash to Pond in 2009: (116,928 tons coal)(11.93% ash**)(2000 lbs/ton) (ft ³ /80 lbs)(yd ³ /27 ft ³)	12,916 yd ³
	2. 24 hour wet and dry weather flows to ash pond: (From 1992 NPDES permit)	<u>52,871 yd³</u> 65,787 yd ³
XIV.	Remaining Detention Buffer Area in Pond: (137,183 yd ³) – (65,787 yd ³)	71,396 yd³

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

** Ash content is a projected average based on projected coal burn