

Ledbetter, Kevin

From: Kennedy, Susan Butler [SKENNEDY@southernco.com]
Sent: Wednesday, August 11, 2010 3:36 PM
To: Ledbetter, Kevin
Cc: Harris, Marc; Markey, Richard M.; Vick, James O.
Subject: RE: GPC Scholz - Updated Ash Pond Language
Attachments: Updated Ash Pond Language 8-11-10.docx; Suggested language for nutrient sampling.docx

Kevin,

Thanks so much for the new language and our discussions today. Here's what Gulf proposes regarding the ash pond inspection requirements and nutrient monitoring.

We'll give you a call at 2pm CST/3pm EST to discuss tomorrow.

Have a good afternoon,

Susan.

Susan B. Kennedy, Q.E.P.
Environmental Affairs
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328
850-444-6153/cell 850-336-6153

From: Ledbetter, Kevin [<mailto:Kevin.Ledbetter@dep.state.fl.us>]
Sent: Wednesday, August 11, 2010 11:34 AM
To: Kennedy, Susan Butler
Cc: Harris, Marc; Markey, Richard M.
Subject: GPC Scholz - Updated Ash Pond Language

Good afternoon Susan,

Please see the attachment above for the updated impoundment requirements for the GPC Scholz draft permit. We have eliminated duplicative requirements and clarified existing conditions. I apologize in the delay in getting them to you today – please let me know if you need some time to review the updated conditions, and we can reschedule our phone call this afternoon.

Sincerely,

Kevin Ledbetter
Engineering Specialist III
Florida Department of Environmental Protection
Industrial Wastewater Section
Power Plant NPDES Permitting
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A. Impoundment Operation and Maintenance

1. All ash impoundments used to hold or treat wastewater and other associated wastes shall be operated and maintained to prevent the discharge of pollutants to waters of the State, except as authorized under this permit.
2. Operation and maintenance of any impoundment shall be in accordance with all applicable State regulations. When practicable, piezometers or other instrumentation shall be used as a means to aid monitoring of impoundment integrity.

B. Impoundment Integrity Inspections

1. No later than January 31, 2011, Gulf Power shall submit to the Department an ash pond inspection plan to review the integrity of the existing ash pond which shall include an annual inspection to be conducted and annually thereafter, all impoundments shall be inspected by qualified personnel with knowledge and training in impoundment integrity. The plan shall be implemented within 60 days of written approval by the Department. Annual inspections shall include observations of dam, dike and toe areas for erosion, cracks or bulges, seepage, wet or soft soil, changes in geometry, the depth and elevation of the impounded water, sediment or slurry, freeboard, changes in vegetation such as overly lush, dead or unnaturally tilted vegetation, and any other changes which may indicate a potential compromise to impoundment integrity.
2. Within 30 days after the annual inspection as described in the plan in B.1, a qualified, responsible officer shall certify to the Department that no breaches or structural defects resulting in the discharges to surface waters of the State and that no changes were observed which may indicate a potential compromise to impoundment integrity during the previous calendar year.

The certification shall also include a statement 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.

3. Follow-up inspections by qualified personnel shall be conducted within 7 days after large or extended rain events (i.e., 10-year, 24-hour precipitation event).
4. In the event that the impoundment integrity is compromised and may result in a potential discharge to surface waters of the State, the permittee shall notify the Department within twenty-four (24) hours of becoming aware of the situation and provide a proposed course of corrective action and implementation schedule within fifteen (15) days after notifying the Department. Observed changes such as significant increases in seepage or seepage carrying sediment may be signs of imminent impoundment failure and should be addressed immediately.

C. Reporting and Recordkeeping Requirements for Impoundments

1. The summarized findings of all monitoring activities, inspections, and corrective actions pertaining to the impoundment integrity, and operation and maintenance of all impoundments shall be documented and kept on-site in accordance with permit Condition V.3, and made available to Department inspectors upon request.
2. Starting with the issuance of this permit, all pertinent impoundment permits, design, construction, operation, and maintenance information, including but not limited to: plans, geotechnical and structural integrity studies, copies of permits, associated certifications by qualified, Florida-registered professional engineer, and regulatory approvals, shall be kept on site in accordance with permit Condition V.3 and made available to Department inspectors upon request.

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Suggested language for I.A.

The permittee shall collect the nutrient data in I.A.1 at a sampling frequency of Quarterly from one year of permit issuance. The sampling frequency shall be reduced to semi-annually unless otherwise stated by the Department.