

Ledbetter, Kevin

From: Kennedy, Susan Butler [SKENNEDY@southernco.com]
Sent: Monday, August 16, 2010 3:21 PM
To: Ledbetter, Kevin
Cc: Markey, Richard M.; Vick, James O.
Subject: Scholz language
Attachments: Updated Ash Pond Language 8-12-10.docx

Kevin - Per our conversation, here's our suggested edits to the ash pond conditions. Thanks for your help, Susan.

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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, and annually thereafter, all impoundments shall be inspected by qualified personnel with knowledge and training in impoundment integrity. 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, 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., +025-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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