



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 2, 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James O. Vick
Assistant City Manager
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Re: Gulf Power Company
Scholz Electric Generating Plant
NPDES Permit No. FL0002283
Renewal Application Request for Additional Information (RFI) #1

Dear Mr. Vick:

On December 14, the Florida Department of Environmental Protection (Department) received your wastewater discharge permit renewal application for the above referenced facility. After reviewing the application, the Department has determined that the submittal is incomplete and additional information will be required pursuant to Rules 62-620.410(1) and 62-620.510(1), Florida Administrative Code, before your application can be further processed. Attachment 1 describes the information needed to process your application.

Please provide, within 45 days from receipt of this letter, three copies of the requested additional information to the Industrial Wastewater Section in Tallahassee and one copy to the Department's Northwest District office in Pensacola. If you have any questions concerning our comments, please contact Kevin Ledbetter or me at (850) 245-8589.

Sincerely,

Marc Harris, P.E.
Supervisor, Power Plant NPDES Permitting
Industrial Wastewater Section

MH/kl

Attachment

cc: Bill Armstrong, P.E., DEP Pensacola
Susan Kennedy, Gulf Power Company
Nancy Ross, DEP Tallahassee

Attachment 1

Comment 1: The analytical results reported by Gulf Power's contracted laboratory for total cyanide, fluoranthene, and phenol at Outfall D-001 indicated the method detection limits (MDL) for the samples were above the Department-established MDLs. The sample collection, analytical methods, and MDLs for all parameters must be performed in accordance with Rule 62-4.246, Chapters 62-160 and 62-601, F.A.C., and 40 CFR Part 136. Specifically, the analytical result indicates the MDL is above 0.1 mg/L.

A list of Department-established analytical methods, and corresponding MDLs and practical quantification limits (PQLs), which is titled "Florida Department of Environmental Protection Table as Required by Rule 62-4.246(4) Testing Methods for Discharges to Surface Water" dated April 26, 2006, is available at the following web site: www.floridadeep.org/labs/docs/final_md1.xls

The MDLs and PQLs listed in this table constitute the minimum MDL and PQL values the Department will accept. Any method listed in the table for the specific parameter may be used for reporting as long as it meets the following requirements:

- a) The laboratory's reported MDL and PQL values for the particular method must be equal to or less than the corresponding method values specified in the table; and,
- b) The laboratory's reported PQL for the specific parameter is less than or equal to the permit limit or applicable water quality criterion stated under Rule 62-302.530, Table: Criteria for Surface Water Quality Classifications, F.A.C., if a permit limit does not exist. If, however, the PQLs for all methods listed in the table for that parameter are above the stated permit limit or the applicable water quality criterion, then the method with the lowest stated PQL must be used.

Please provide an explanation for the high MDL for the results.

Comment 2: The application stated in Form 2CS that the maximum daily and long term average concentrations for oil and grease was < 3.5 mg/L. The facility previously has had exceedances of the permit limitation and water quality standard (WQS) of 5.0 mg/L at outfall D-001 (11/30/2008 and 12/30/2008 – 7.5 mg/L, as reported by the facility). Please provide information on the corrective actions taken to ensure the facility will meet the WQS for oil and grease at outfall D-001.

Comment 3: The application did not include data for hardness for discharge from Outfall D-001. This data is necessary for calculating the hardness-based WQS for various metals. Please provide representative hardness data for the discharges. If hardness was not analyzed when the characterization data was obtained, additional sampling and analyses will be needed for each constituent with a hardness-based WQS.

Comment 4: No chemicals were listed to be used at the facility for this upcoming permit cycle. Please list all other biocides or chemical additives, if any, which GPC intends using but are not listed in the renewal application. In addition, please provide material safety and data sheets (MSDS) for all biocides or chemical additives listed in GPC's response.

Comment 5: If chemicals are to be used at the facility during the upcoming permit cycle, please indicate whether GPC expects these chemicals to contribute priority pollutants in detectable amounts into waters of the state. If the chemicals are not expected to contribute priority pollutants, please provide a Professional Engineer (P.E.) sealed letter stating that based upon the review of the MSDS and manufacturer supplied information, GPC does not expect pollutants to be contributed.