

Mar: 04-27-10



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

April 23, 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
Smith Electric Generating Station
NPDES Permit No. FL0002283
Renewal Application Request for Additional Information (RFI) #2

Dear Mr. Vick:

On March 23, the Florida Department of Environmental Protection (Department) received Gulf Power Company's (GPC) response to the Department's Request of Additional Information dated February 2, 2010, for the above referenced project. 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 (F.A.C.), 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: Susan Kennedy, Gulf Power Company
Bill Armstrong, P.E., DEP Pensacola
Nancy Ross, DEP Tallahassee

Attachment 1

Please note that the comment numbering below is consistent with prior requests for additional information.

1. Response acknowledged.
2. Response acknowledged.
3. Response acknowledged.
4. The previous permit included authorization to use hydrazine and ammonia in the boiler water system; however, Gulf Power Company's (GPC) response only mentioned calcium hypochlorite (Sanuril®). Please indicate whether GPC no longer intends to use hydrazine and ammonia in the boiler water system. In addition, please indicate whether calcium hypochlorite has been previously approved for use.
5. Response acknowledged.
6. GPC's response stated that calcium hypochlorite will be used at up to 40 mg/L. However, according to AQUIRE, calcium hypochlorite acute toxicities to catfish, carp, fathead minor, and Daphnia are approximately 60, 219, 840, and 4270 ug/L, respectively. As the hypochlorite will be used in the once-through cooling water system, with little to no dilution from other wastewater sources at the facility, please provide the following:
 - a. the highest anticipated concentration at the point of discharge;
 - b. the length of time for each application; and
 - c. information on the dechlorination system if one is used.
7. Response acknowledged.
8. Response acknowledged.
9. Response acknowledged.
10. Response acknowledged.
11. The Department is awaiting response from GPC concerning the comments pertaining to 316(b) and thermal studies included in the application.