

March 18, 2010

Mr. Marc Harris
Supervisor, Power Plant NPDES Permitting
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399



CERTIFIED MAIL # 7009 1680 0001 7427 5614

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

Dear Mr. Harris:

Gulf Power received your letter dated February 2, 2010 regarding the above-referenced facility. Gulf Power offers the following responses to your questions. For reference, the Department's requests are listed in bold:

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 limit (MDL) for the samples were above the Department-established analytical 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...with the lowest stated PQL must be used. Please provide an explanation for the high MDL for the total cyanide results.

Gulf Power has reviewed the analytical results, and corresponding MDLs for D-001 for total cyanide, fluoranthene, and phenol at Outfall D-001 and notes the following:

Parameter	Result at D-001	MDL reported
Total cyanide	<6 ug/L	0.0060 mg/L or 6 ug/L
Fluoranthene	<4.9 ug/L	4.9 ug/L
Phenol	< 5 ug/L	5.0 ug/L

The reported MDLs for total cyanide and fluoranthene, and phenol are not above 0.1 mg/L. All are reported below 0.1 mg/L.

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Industrial Wastewater
Section

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.

As reported to the Department's NW District Panama City office, Gulf Power immediately took action to investigate the exceedances reported above. Gulf believed the samples analyzed by Test America Tallahassee to be suspect. The following information was provided via email on 12/8/08 to Mr. Mark Sumner of the NW District:

“On 10/14/08, an O&G quarterly compliance sample was collected from the plant discharge. The discharge results were 6.9 mg/L. The discharge compliance limit is 5.0 mg/L.

On 11/11/08, another O&G quarterly compliance sample was collected from the discharge. The discharge results were 7.50 mg/L.

On 11/20/08, Test America Tallahassee which analyzed all the O&G results referenced-above informed Gulf Power that they will no longer be analyzing O&G at their facility and will be sending the samples to the Test America Lab in Tampa. Gulf Power spoke to Test America Tallahassee concerning this change in procedure. Test America Tallahassee let us know that because they analyze so few O&G samples, a decision was made to send the sample to Test America Tampa to optimize work efforts.

Based on the information from Test America Tallahassee, Gulf Power thought it prudent to collect another discharge O&G sample and send the sample to Test America Mobile for analysis. A sample was collected on 11/24/08 from the discharge and sent to Test America Mobile for O&G analysis. All samples results were undetectable.

Based on these results from Test America Mobile, Gulf Power believes that analysis from Test America Tallahassee is invalid and will begin sending all O&G samples to Test America Mobile.”

In addition, Gulf Power has had no exceedances for Oil and Grease at D-001 since December 2008.

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.

Gulf Power provided Form 2CS as required. The Form 2CS application does not require a result to be reported for Hardness. Gulf Power collected a hardness sample on 6/24/2009 which was reported at 60 mg/L. Laboratory reports are enclosed under Attachment 1. All samples reported for D-001 in the

application were either collected on 6/24/2009 or 7/9/2009. Therefore the hardness value collected on 6/24/2009 is representative.

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.

Gulf Power intends to continue use of Calcium Hypochlorite at Plant Scholz and has attached the material safety and data sheets under Attachment 2.

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 review of the MSDS and manufacturer supplied information, GPC does not expect pollutants to be contributed.

Gulf Power does not expect Calcium Hypochlorite to contribute priority pollutants and has provided a P.E. sealed letter under Attachment 2.

Comment 6: For each chemical proposed to be used for facility activities, if any, please provide where each chemical will be used, the frequency of use, the amount used, whether the chemical will be used alone or with other chemicals, and how much of the chemical will be in the effluent at the sampling point EFF-1. Also, please provide a product label for each chemical proposed to be used.

<i>Chemical</i>	<i>Where Used?</i>	<i>Frequency of Use?</i>	<i>Amount Used?</i>	<i>With other chemicals?</i>	<i>How much at EFF-1?</i>
Calcium Hypochlorite	Once through cooling water system.	Approximately Once per week	Up to 40 mg/L	None	None in detectable concentrations

Gulf Power has included the product label under Attachment 2.

Comment 7: Page 2A-3 of the application states that a reuse or land application site is located at the facility; however, page 2A-18 states that the reuse or land application system is "NA". Please explain what is involved in the domestic plant reuse.

Page 2A-3 which stated that a reuse or land application site is located at the facility is incorrect. Gulf Power has provided an updated page 2A-3 under Attachment 3.

Comment 8: Page 2A-30, Section 8.3.a, of the application states that the Operation and Maintenance Performance Report has not been submitted. Please submit the Operation and Maintenance Report for review by the Department.

The Domestic Wastewater Treatment Plant regulated under permit FL0002283 has no requirement for an Operation and Maintenance Report. Therefore this request is not applicable.

Comment 9: Page 2A-30, Section 8.1.e, states that the Capacity Analysis Report has not been submitted. Please submit the Capacity Analysis Report for review by the Department.

The Domestic Wastewater Treatment Plant regulated under permit FL0002283 has no requirement for submittal of a Capacity Analysis Report. Therefore this request is not applicable.

Comment 10: Page 2A-32, Section 9.2.a, gives the location of the operation and maintenance manual as "N/A. Please submit the location of the operation and maintenance manual.

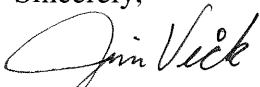
The Domestic Wastewater Treatment Plant regulated under permit FL0002283 has no requirement for an Operation and Maintenance Manual. Therefore this requirement is not applicable.

Comment 11: Comments regarding the Impingement Mortality Characterization Study [316(b)] and the Biological Monitoring Plan will be provided to the facility upon receipt of comments from the Department's Biology Section following completion of their review.

Gulf Power duly notes the Department's statement and will respond accordingly after receipt of the comments from the Biology Section.

Please feel free to contact Susan Kennedy at (850) 444-6153 or Joe Neese at (850) 444-6429 of my staff if you have any questions or need any additional information.

Sincerely,



James O. Vick
Environmental Affairs

Cc: Bill Armstrong, FDEP Pensacola

Cc (email): Kevin Ledbetter, FDEP Tallahassee
Nancy Ross, FDEP Tallahassee
Corinna Clanton, FDEP Panama City
Brian Heinfeld, Gulf Power Plant Scholz
Kenny Peacock, Gulf Power Plant Scholz
Jora Maxwell, Gulf Power Plant Scholz
Mike Markey, Gulf Power

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ATTACHMENT 1

ANALYTICAL REPORT

Job Number: 700-39533-1

Job Description: Scholz - NPDES

For:

Gulf Power Company

Scholz Plant

1460 Gulf Power Road

Sneads, FL 32460

Attention: Mr. Kenny Peacock



Approved for release.
Mike Nance
Project Manager II
7/9/2009 5:42 PM

Mike Nance

Project Manager II

mike.nance@testamericainc.com

07/09/2009

cc: Ms. Susan Harris
Susan Kennedy

METHOD SUMMARY

Client: Gulf Power Company

Job Number: 700-39533-1

Description	Lab Location	Method	Preparation Method
Matrix Water			
Metals (ICP)	TAL MOB	40CFR136A 200.7 Rev 4.4	
Preparation, Total Metals	TAL MOB		EPA 200.7
Total Suspended Solids	TAL MOB	SM20 2540D	

Lab References:

TAL MOB = TestAmerica Mobile

Method References:

40CFR136A = "Methods for Organic Chemical Analysis of Municipal Industrial Wastewater", 40CFR, Part 136, Appendix A, October 26, 1984 and subsequent revisions.

EPA = US Environmental Protection Agency

SM20 = "Standard Methods For The Examination Of Water And Wastewater", 20th Edition."

METHOD / ANALYST SUMMARY

Client: Gulf Power Company

Job Number: 700-39533-1

Method	Analyst	Analyst ID
40CFR136A 200.7 Rev 4.4	Tao, Zunyu S	ZST
SM20 2540D	Norvang, Vanyda A	VAN

SAMPLE SUMMARY

Client: Gulf Power Company

Job Number: 700-39533-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
700-39533-1	Ash Pond Composite	Water	06/24/2009 0930	06/25/2009 1118
700-39533-2	Ash Pond Grab	Water	06/24/2009 0930	06/25/2009 1118
700-39533-3	Plant Discharge Composite	Water	06/24/2009 1015	06/25/2009 1118
700-39533-4	Intake Composite	Water	06/24/2009 1000	06/25/2009 1118

SAMPLE RESULTS

Analytical Data

Client: Gulf Power Company

Job Number: 700-39533-1

Client Sample ID: Plant Discharge Composite

Lab Sample ID: 700-39533-3

Date Sampled: 06/24/2009 1015

Client Matrix: Water

Date Received: 06/25/2009 1118

200.7 Rev 4.4 Metals (ICP)

Method: 200.7 Rev 4.4
Preparation: 200.7
Dilution: 1.0
Date Analyzed: 06/26/2009 2230
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058

Instrument ID: ICP
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	Result (ug/L)	Qualifier	MDL	RL
Cadmium	0.42	U	0.42	5.0
Copper	4.8	I	1.1	20
Iron	490		19	50
Lead	2.9	U	2.9	5.0

Analytical Data

Client: Gulf Power Company

Job Number: 700-39533-1

Client Sample ID: Intake Composite

Lab Sample ID: 700-39533-4

Date Sampled: 06/24/2009 1000

Client Matrix: Water

Date Received: 06/25/2009 1118

200.7 Rev 4.4 Metals (ICP)

Method: 200.7 Rev 4.4
Preparation: 200.7
Dilution: 1.0
Date Analyzed: 06/26/2009 2237
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058

Instrument ID: ICP
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	Result (ug/L)	Qualifier	MDL	RL
Cadmium	0.42	U	0.42	5.0
Copper	1.1	U	1.1	20
Iron	390		19	50
Lead	2.9	U	2.9	5.0

Analytical Data

Client: Gulf Power Company

Job Number: 700-39533-1

Client Sample ID: Ash Pond Grab

Lab Sample ID: 700-39533-2

Date Sampled: 06/24/2009 0930

Client Matrix: Water

Date Received: 06/25/2009 1118

200.7 Rev 4.4 Metals (ICP)

Method: 200.7 Rev 4.4

Analysis Batch: 700-69149

Instrument ID: ICP

Preparation: 200.7

Prep Batch: 700-69058

Lab File ID: JUN2609

Dilution: 1.0

Initial Weight/Volume: 50 mL

Date Analyzed: 06/26/2009 2223

Final Weight/Volume: 50 mL

Date Prepared: 06/25/2009 1441

Analyte	Result (ug/L)	Qualifier	MDL	RL
Nickel	4.1	I	3.2	40

Analytical Data

Client: Gulf Power Company

Job Number: 700-39533-1

Client Sample ID: Plant Discharge Composite

Lab Sample ID: 700-39533-3

Date Sampled: 06/24/2009 1015

Client Matrix: Water

Date Received: 06/25/2009 1118

200.7 Rev 4.4 Metals (ICP)

Method: 200.7 Rev 4.4

Analysis Batch: 700-69149

Instrument ID: ICP

Preparation: 200.7

Prep Batch: 700-69058

Lab File ID: JUN2609

Dilution: 1.0

Initial Weight/Volume: 50 mL

Date Analyzed: 06/26/2009 2230

Final Weight/Volume: 50 mL

Date Prepared: 06/25/2009 1441

Analyte	Result (mg/L)	Qualifier	MDL	RL
Calcium	21		0.025	0.50
Hardness	60		3.3	3.3
Magnesium	2.2		0.029	0.50

Analytical Data

Client: Gulf Power Company

Job Number: 700-39533-1

Client Sample ID: Intake Composite

Lab Sample ID: 700-39533-4

Date Sampled: 06/24/2009 1000

Client Matrix: Water

Date Received: 06/25/2009 1118

200.7 Rev 4.4 Metals (ICP)

Method: 200.7 Rev 4.4

Analysis Batch: 700-69149

Instrument ID: ICP

Preparation: 200.7

Prep Batch: 700-69058

Lab File ID: JUN2609

Dilution: 1.0

Initial Weight/Volume: 50 mL

Date Analyzed: 06/26/2009 2237

Final Weight/Volume: 50 mL

Date Prepared: 06/25/2009 1441

Analyte	Result (mg/L)	Qualifier	MDL	RL
Calcium	20		0.025	0.50
Hardness	57		3.3	3.3
Magnesium	1.8		0.029	0.50

Analytical Data

Client: Gulf Power Company

Job Number: 700-39533-1

General Chemistry

Client Sample ID: Ash Pond Composite

Lab Sample ID: 700-39533-1

Date Sampled: 06/24/2009 0930

Client Matrix: Water

Date Received: 06/25/2009 1118

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Total Suspended Solids	3.0		mg/L	2.0	2.0	1.0	2540D
Analysis Batch:	Date Analyzed: 06/25/2009 1530						

DATA REPORTING QUALIFIERS

Client: Gulf Power Company

Job Number: 700-39533-1

Lab Section	Qualifier	Description
Metals		
	U	Indicates that the compound was analyzed for but not detected.
	I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
General Chemistry		
	U	Indicates that the compound was analyzed for but not detected.

QUALITY CONTROL RESULTS

Quality Control Results

Client: Gulf Power Company

Job Number: 700-39533-1

Method Blank - Batch: 700-69058

Method: 200.7 Rev 4.4
Preparation: 200.7

Lab Sample ID: MB 700-69058/1-A
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/26/2009 2017
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058
Units: ug/L

Instrument ID: TJA ICP TRACE
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	Result	Qual	MDL	RL
Cadmium	0.42	U	0.42	5.0
Calcium	25	U	25	500
Copper	1.1	U	1.1	20
Hardness	3300	U	3300	3300
Iron	19	U	19	50
Lead	2.9	U	2.9	5.0
Magnesium	29	U	29	500
Nickel	3.2	U	3.2	40

Lab Control Sample/ Lab Control Sample Duplicate Recovery Report - Batch: 700-69058

Method: 200.7 Rev 4.4
Preparation: 200.7

LCS Lab Sample ID: LCS 700-69058/2-A
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/26/2009 2023
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058
Units: ug/L

Instrument ID: TJA ICP TRACE
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

LCSD Lab Sample ID: LCSD 700-69058/3-A
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/26/2009 2029
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058
Units: ug/L

Instrument ID: TJA ICP TRACE
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Cadmium	103	103	85 - 115	0	20		
Calcium	103	103	85 - 115	0	20		
Copper	104	103	85 - 115	1	20		
Iron	101	102	85 - 115	1	20		
Lead	102	102	85 - 115	0	20		
Magnesium	101	101	85 - 115	0	20		
Nickel	102	103	85 - 115	1	20		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: Gulf Power Company

Job Number: 700-39533-1

Matrix Spike - Batch: 700-69058

Method: 200.7 Rev 4.4

Preparation: 200.7

Lab Sample ID: 700-39533-4
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/26/2009 2243
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058
Units: mg/L

Instrument ID: TJA ICP TRACE
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	Sample Result/Qual	Spike Amount	Result	% Rec.	Limit	Qual
Calcium	20	1.00	21.0	95	85 - 115	
Magnesium	1.8	1.00	2.78	100	85 - 115	

Matrix Spike - Batch: 700-69058

Method: 200.7 Rev 4.4

Preparation: 200.7

Lab Sample ID: 700-39533-4
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/26/2009 2243
Date Prepared: 06/25/2009 1441

Analysis Batch: 700-69149
Prep Batch: 700-69058
Units: ug/L

Instrument ID: TJA ICP TRACE
Lab File ID: JUN2609
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	Sample Result/Qual	Spike Amount	Result	% Rec.	Limit	Qual
Cadmium	0.42 U	1000	1020	102	85 - 115	
Copper	1.1 U	1000	1010	101	85 - 115	
Iron	390	1000	1330	94	85 - 115	
Lead	2.9 U	1000	1010	101	85 - 115	
Nickel	3.2 U	1000	1020	102	85 - 115	

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: Gulf Power Company

Job Number: 700-39533-1

Method Blank - Batch: 700-69091

Method: 2540D
Preparation: N/A

Lab Sample ID: MB 700-69091/1
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/25/2009 1530
Date Prepared: N/A

Analysis Batch: 700-69091
Prep Batch: N/A
Units: mg/L

Instrument ID: Wet Chemistry Balance 1
Lab File ID: N/A
Initial Weight/Volume: 100 mL
Final Weight/Volume: 100 mL

Analyte	Result	Qual	RL	RL
Total Suspended Solids	2.0	U	2.0	2.0

Lab Control Sample/ Lab Control Sample Duplicate Recovery Report - Batch: 700-69091

Method: 2540D
Preparation: N/A

LCS Lab Sample ID: LCS 700-69091/2
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/25/2009 1530
Date Prepared: N/A

Analysis Batch: 700-69091
Prep Batch: N/A
Units: mg/L

Instrument ID: Wet Chemistry Balance 1
Lab File ID: N/A
Initial Weight/Volume: 100 mL
Final Weight/Volume: 100 mL

LCSD Lab Sample ID: LCSD 700-69091/3
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/25/2009 1530
Date Prepared: N/A

Analysis Batch: 700-69091
Prep Batch: N/A
Units: mg/L

Instrument ID: Wet Chemistry Balance 1
Lab File ID: N/A
Initial Weight/Volume: 100 mL
Final Weight/Volume: 100 mL

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Total Suspended Solids	96	101	80 - 120	5	25		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: Gulf Power Company

Job Number: 700-39533-1

**Matrix Spike/
Matrix Spike Duplicate Recovery Report - Batch: 700-69091**

**Method: 2540D
Preparation: N/A**

MS Lab Sample ID: 700-39533-1
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/25/2009 1530
Date Prepared: N/A

Analysis Batch: 700-69091
Prep Batch: N/A

Instrument ID: Wet Chemistry Balance 1
Lab File ID: N/A
Initial Weight/Volume: 100 mL
Final Weight/Volume: 100 mL

MSD Lab Sample ID: 700-39533-1
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 06/25/2009 1530
Date Prepared: N/A

Analysis Batch: 700-69091
Prep Batch: N/A

Instrument ID: Wet Chemistry Balance 1
Lab File ID: N/A
Initial Weight/Volume: 100 mL
Final Weight/Volume: 100 mL

Analyte	<u>% Rec.</u>		Limit	RPD	RPD Limit	MS Qual	MSD Qual
	MS	MSD					
Total Suspended Solids	99	100	80 - 120	1	25		

Calculations are performed before rounding to avoid round-off errors in calculated results.

THE LEADER IN ENVIRONMENTAL TESTING

Mobile

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

www.testamericainc.com

Phone: (251) 666-6633

Fax: (251) 666-6696

Alternate Laboratory Name/Location:

Phone:

Fax:

[illegible]

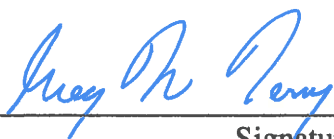
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Original - Return to Laboratory with Sample(s)

ATTACHMENT 2

Gulf Power does not expect the following chemicals to contribute priority pollutants in detectable amounts into waters of the state based either on review of the MSDS for the chemical or manufacturer supplied information.

<i>Chemical</i>	<i>MSDS or manufacturer supplied information</i>
Calcium Hypochlorite	Manufacturer supplied information



Signature

Gulf Power Company
Company Name

Greg N. Terry

Name

One Energy Place, Pensacola, FL 32520-0328

Florida Registration No.: 52786

Telephone No.: 850-444-6144

Date: 3-16-2010

Net Contents: 45 Pounds/20.4 Kilograms

SANURIL

T A B L E T S

A Concentrated Chlorinating Agent For Use
As A Bactericide And Disinfectant

ACTIVE INGREDIENT:

Calcium hypochlorite

INERT INGREDIENTS:

Contains a minimum of 70% Available Chlorine

KEEP OUT OF REACH OF CHILDREN

DANGER

See additional precautionary statements on back panel.
WATER

2010 3 8



SANURIL® 115
Mixed Halogen Formulation
Material Safety Data Sheet

1. GENERAL PRODUCT INFORMATION

Product Name	SANURIL® 115
US EPA Reg. No.	48482-5
Synonyms	Calcium hypochlorite and 1-bromo-3-chloro-5,5-dimethylhydantoin
Product Use	Disinfecting agent for wastewater
NIOSH* Ratings	3 HIGH HEALTH HAZARD
	0 NON COMBUSTIBLE
	2 MODERATELY REACTIVE

*Ratings based upon "Identification System for Occupationally Hazardous Materials (1974)"

DEPARTMENT OF TRANSPORTATION INFORMATION

Proper Shipping Name	Calcium Hypochlorite, Hydrated Mixture RQ
Hazard Class	Oxidizer
UN Number	UN2880
Shipping Class	55

MANUFACTURER INFORMATION

Company Name	Severn Trent Services, Inc.	
Street Address	1110 Industrial Boulevard	
City, State, Zip	Sugar Land, Texas 77478	
Emergency Phone	1-800-424-9300	
Office Phone	(281) 240-6770	Toll Free: 1-800-621-9189
Date Prepared	4/18/1990	Last Revision: 06/01/2003

2. HAZARDOUS INGREDIENTS

Chemical Name	% of Mixture	TLV	PEL	CAS #
Calcium Hypochlorite	69.30%	N/A	N/A	7778-54-3
1-bromo-3-chloro-5,5-dimethylhydantoin	0.94%	10	15	126-06-7
TLV/PEL OF MIXTURE (If known)	N/A			

3. PHYSICAL PROPERTIES

Boiling Point	None; dry solid	Vapor Density	N/A
Melting Point	N/A	Vapor Pressure	N/A
Specific Gravity	1.8 min (tablet)	Percent Volatiles	N/A
Solubility in Water	6% by weight (min)		
pH	8.3 (1% solution)		
Density (@ 20°C)	1.0		
Color	White solid tablet		
Odor	Slight chlorine. N-bromo compounds have a stench like odor. It is not as "sweet" as chlorine.		

4. ECOLOGICAL INFORMATION

Ecotoxicological Information:

Highly toxic, 10-1 ppm (fish) 96-hour TLM LC50

5. FIRE AND EXPLOSION DATA

Flash Point	N/A	Explosive Limit	Lower: N/A
Auto Ignite Temperature	N/A		Upper: N/A
Flammability Limits In Air	N/A	Extinguishing Media	Water ONLY

5. FIRE AND EXPLOSION DATA (Cont.)**Special Fire Fighting Procedures:**

This product is a strong oxidizer. Use ONLY water in the event of a fire or a violent reaction may result by contamination. Wear self-contained breathing apparatus.

Unusual Hazard Information:

Contamination with organics, acids, alkalis, and strong reducing agents will result in fire or rapid decomposition. Spontaneous decomposition temperature for this product is 350°F. In large fires fueled by other materials, the product may smolder for prolonged periods emitting dense black smoke.

6. HEALTH HAZARD INFORMATION

This section describes the nature of the hazardous effects resulting from exposure to this product.

Routes of Exposure:

- Ingestion:** Highly toxic by ingestion. May cause severe inflammation and erosion to the lining of the esophagus and stomach. Promptly induces vomiting.
- Eye Contact:** Mild to moderate exposure to dust causes irritation of the eyes. Severe exposure can cause permanent (irreversible) damage.
- Skin Contact:** Mild to moderate exposure to dust may irritate the skin. Greater exposure can cause severe irritation.
- Inhalation:** Mild to moderate exposure to dust causes irritation to the mucous membranes of the respiratory passages (nasal and throat).

Effects of Overexposure:

- Acute:** Ingestion may result in erosion of the esophagus and stomach. Vomiting, gastric bleeding and possible circulatory collapse. Exposure may cause temporary or permanent tissue damage to skin, eyes, and respiratory passages.
- Chronic:** Prolonged and intensive exposure may result in tissue damage to body surfaces unless promptly treated.

Emergency and First Aid Procedures:

- Eyes:** IMMEDIATELY flush eyes with large amounts of water for at least 15 minutes, holding lids apart to ensure flushing of entire eye surface. SEEK MEDICAL ATTENTION.
- Skin:** Wash with plenty of soap and water. Remove contaminated clothing and footwear. Wash clothing before reuse. Footwear should be decontaminated before reuse. Seek medical attention if symptoms persist.
- Inhalation:** Get person out of contaminated area to fresh air. If breathing has stopped, resuscitate and administer oxygen if readily available. SEEK MEDICAL ATTENTION.
- Ingestion:** NEVER give anything by mouth to an unconscious person. Drink large amounts of water. DO NOT induce vomiting. Call a physician immediately!

7. REACTIVITY DATA**Conditions contributing to instability:**

Contamination with flammables, organics may cause fire or explosion. Acids will release chlorine and bromine gas.

Incompatibility (Materials to avoid):

Acids, flammables, organic materials, readily oxidizable materials and strong reducing agents.

Hazardous decomposition or byproducts:

Chlorine gas, hydrogen bromide, bromine and hydrogen chloride.

Hazardous polymerization:

This product is not known to polymerize.

8. SPILL OR LEAK PROCEDURES (DEVELOP SPILL PLAN)**Neutralizing Chemicals:**

Sodium sulfite, sodium bisulfite or sodium metabisulfite.

Steps to be Taken If Material Is Released and/or Spilled:

Wear appropriate protective gear: rubber gloves and boots. Chemical splash goggles and breathing apparatus if necessary. Avoid contact with clothing—fire may result.

Dilute spill area with large quantities of water, at least 100 gallons of water per pound of material. Avoid contact with resulting solution. Neutralize with sodium sulfite, sodium bisulfite or sodium metabisulfite. Collected neutralized solution should be disposed of through sewage treatment plant. Prior approval from plant personnel as well as Local, State and Federal environmental agencies should be obtained. File environmental spill notifications if necessary.

Waste Disposal Methods:

DO NOT dispose of material in dry form in waste container—fire may result. Proceed with spill procedure as outlined above.

Additional Precautions:

Do not attempt to recover solid material. Do not dispose of material in waste container. Do not reuse empty container, but place in trash collection.

9. INDUSTRIAL HYGIENE CONTROL MEASURES**Ventilation Requirements:**

Work in well ventilated areas. Storage area should be well ventilated.

Specific Personal Protective Equipment:

Respiratory protection is not required under normal use, however when necessary, use NIOSH/MSHA approved respirator following manufacturer's recommendations. NIOSH approved dust mask is essential where dusting may occur.

Eye Protection: Chemical safety glasses should be worn.

Protective Gloves: Gloves should be worn. Rubber or other chemically resistant materials are recommended as suitable material.

Other Clothing and Equipment: Protective clothing should be worn so as to minimize skin contact. Avoid contact with clothing. Fire may result from contact of dry material with cloth or flammables.

10. SPECIAL PRECAUTIONS

Danger:

Highly corrosive. Causes skin and eye damage. May be fatal if swallowed. DO NOT get in eyes or on clothing. Wear goggles and CLEAN protective gloves when handling. Irritating to nose and throat. DO NOT breathe dust and fumes. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

This product is toxic to fish. Do not discharge into lakes, streams, ponds or public waters unless in accordance with an NPDES permit.

Strong oxidizing agent. Mix this product only with water. Use clean dry utensils. Open container only where adequate ventilation is available. Do not add this product to any dispensing device containing remains of any other product. In case of contamination/decomposition, do not reseal container. If possible, isolate container in open air and flood with large volumes of water.

11. STORAGE AND DISPOSAL

Storage:

Keep product dry and in a tightly closed container when not in use. Store in cool, dry, well ventilated area, keeping it away from heat sources and/or open flames. Handle container with care—DO NOT drop, roll or skid. In case of decomposition, isolate container (if possible) and flood with large amounts of water to dissolve all material. Follow "Spill and Leak Procedures" as outlined in Section 8 of this Data Sheet.

Keep in original container. DO NOT store/transfer/repack this product in any other container without the approval/authorization of Severn Trent Services, Inc.

Disposal:

Follow "Spill and Leak Procedures" as outlined in Section 8 of this Data Sheet. DO NOT reuse empty container. Wash thoroughly with water and discard clean container in a safe place.

Do not contaminate food or feed by storage, disposal or cleaning of equipment.

All information, recommendations and suggestions appearing herein concerning our products are based upon tests and data believed to be reliable; however, it is the user's responsibility to determine the safety, toxicity and suitability for his own use of the products described herein. Since the actual use by others is beyond our control, no guarantee, expressed or implied, is made Severn Trent Services, Inc., as to the effects of such use, the results to be obtained or the safety and toxicity of the products nor does EIC assume any liability arising out of use by others, of the products contained herein. The information herein is not to be construed as absolutely complete since additional information may be necessary or desirable when particular or exceptional conditions or circumstances exist or because of applicable laws or government regulations. Nothing herein contained is to be construed as a recommendation to infringe any patent.

ATTACHMENT 3

7. Reclaimed Water Reuse and Effluent Disposal

Method of Reuse or Disposal	Number of Reuse or Disposal Points	Total Design Capacity (mgd)	Basis of Design Flow
Surface Waters - Excluding Ocean Outfalls and Wetlands (Rule 62-600.510, F.A.C.)	0		
Ocean Outfalls (Rule 62-600.520, F.A.C.)	0		
Wetlands (Rule 62-600.620, F.A.C.)	0		
Reuse of Reclaimed Water and Land Application (Rule 62-600.530, F.A.C.)	0		
Ground Water Disposal by Underground Injection (Rule 62-600.540, F.A.C.)	0		
Other (Describe)	Industrial WW System	0.0025	
Total	1	0.0025	

8. Flows to Another Wastewater Facility

a. Does the facility discharge or transport treated or untreated wastewater to another treatment facility?

☐ Yes ☒ No

b. If yes, describe the mean(s) by which the wastewater from the treatment facility is discharged or transported to the other treatment facility (e.g., collection/transmission system, reclaimed water distribution system)?

n/a

If transport is by a party other than the applicant, provide the following:

Transporter name: n/a

Mailing Address:

Contact person:

Title:

Telephone number:

c. For each treatment facility that receives this discharge, provide the following:

Name:

Mailing Address:

Contact person:

Title:

Telephone number: