



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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RICK SCOTT
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JONATHAN P. STEVERSON
SECRETARY

April 15, 2015

SENT BY EMAIL TO:
(jovick@southernco.com)

Mr. James O. Vick
Environmental Affairs
Gulf Power Company (GPC)
One Energy Place
Pensacola, Florida 32520-0328

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

Dear Mr. Vick,

On March 20, 2015, the Florida Department of Environmental Protection (Department) received your wastewater discharge permit renewal application for the above referenced permit. After review, the Department has determined that the application 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 additional information needed to further process your application.

Please provide, within 30 days from receipt of this letter, three hardcopies, or one hardcopy and an electronic copy, of the requested information to the Industrial Wastewater Program in Tallahassee (epost.bwfriw@dep.state.fl.us) and one copy to the Department's Northwest District Office in Pensacola. If you have any questions concerning our comments, please contact Frank Wall or me at (850) 245-8589.

Sincerely,

Marc Harris, P.E.
Environmental Administrator
Power Plant NPDES Permitting
Industrial Wastewater Program

MH/fw

Attachment

cc: Robert Jernigan, GPC (rjjernig@southernco.com)
Mike Markey, P.G., GPC (rmmarkey@southernco.com)
Bill Evans, P.E., DEP Pensacola (bill.evans@dep.state.fl.us)
Kim Allen, DEP Pensacola (kim.allen@dep.state.fl.us)

Attachment 1

1. Please describe current and projected operations for the upcoming permit cycle at the facility in terms of power generation, maintenance activities, withdrawal of intake water whether for cooling or maintenance, and discharges from the ash pond and to the river via Outfalls I-012 and D-001, respectively.

Form 2CS:

2. Please resubmit the flow diagrams to include all flows between operations and treatment units in terms of average flows and if providing maximum flows distinguish between average and maximum. Please see Part IV instructions for detailed requirements.
3. Please provide laboratory reports for Outfall D-001 effluent characterization.
4. Per the instruction item VII.A. (Reporting), if “only one daily value was measured, complete only “Max. Daily Values” columns and insert “1” into the “Number of Analyses” column” for Parts A, B, and C of Section VII. The long term average values were reported rather than the maximum daily values in which the majority of the analyses were based on one value. Please clarify and resubmit the effluent characterization for Outfall D-001.
5. Please complete Parts VII.A.1.i and j.
6. Part VII.C.1.4V. (Bis (Chloromethyl) Ether). Item VII.C instructions (Analysis) states, “You must use test methods promulgated in 40 CFR Part 136 or Chapter 160, Florida Administrative Code; however, if none has been promulgated for a particular pollutant, you may use any suitable method for measuring the level of the pollutant in your discharge if you submit a description of the method or a reference to a publish method.” Please report the analytical result and analytical method used along with the method detection limit and practical quantitation limit for that method.
7. Please provide the hardness value and calculated hardness based limit for cadmium, chromium, copper, lead, nickel, and zinc for Part VII.C.1 parameters 4M, 5M, 6M, 7M, 9M, and 13M.
8. Please complete Section VII.D per the completeness instructions. Enter “NA” if the item is not applicable.
9. Please submit the effluent characterization, Part VII.A-D, for internal Outfall I-012, and include the items requested in No. 7 above.

Form 2CG:

10. Per the instruction item V.A. (Reporting), if “only one daily value was measured, complete only “Max. Daily Values” columns and insert “1” into the “Number of Analyses” column” for Parts A, B, and C of Section V. The long term average values were reported rather than the maximum daily values in which the majority of the analyses were based on one value. Please clarify and resubmit the effluent characterization for internal Outfall I-012.
11. Please complete Parts V.A.1.h - m.
12. Part V.C.1.4V. (Bis (Chloromethyl) Ether). Item V.C instructions (Analysis) states, “You must use test methods promulgated in 40 CFR Part 136 or Chapter 160, Florida Administrative Code; however, if none has been promulgated for a particular pollutant, you may use any suitable method for measuring the level of the pollutant in your discharge if you submit a description of the method or a reference to a publish method.” Please report the analytical result and analytical method used along with the method detection limit and practical quantitation limit for that method.
13. Please provide the hardness value and calculated hardness based limit for cadmium, chromium, copper, lead, nickel, and zinc for Part V.C.1 parameters 4M, 5M, 6M, 7M, 9M, and 13M.

Form 2A:

14. Please confirm whether high-level or low-level disinfection is performed.

15. Section 3.B, item 9 on page 2A-19, "Additional Information Required for Reuse Systems Permitted under Part III of Chapter 62-610, F.A.C." This section (both 9.b. and 9.c.) should be blank if the facility does not produce public access reuse effluent. Please confirm that the facility will produce public access reuse effluent.
16. Please update the Operation and Maintenance Performance Report, figure 2 process flow diagram on page 4. The residuals to land disposal flow should be either to a wastewater treatment facility or a Class 1 landfill.
17. Please clarify in the Operation and Maintenance Performance Report, Section 2, table 2 on page 6 whether the flow meter criteria 4 should be "yes" rather than "no".