

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**ENVIRONMENTAL COST RECOVERY CLAUSE
DOCKET NO. 980007-EI**

PREPARED DIRECT TESTIMONY
AND EXHIBIT OF

J. O. VICK

JANUARY 1999 - DECEMBER 1999
PROJECTION

OCTOBER 12, 1998



A SOUTHERN COMPANY

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FPSC-RECORDS/REPORTING

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission
3 Prepared Direct Testimony of
4 James O. Vick
Docket No. 980007-EI
October 12, 1998

5 Q. Please state your name and business address.

6 A. My name is James O. Vick and my business address is One
7 Energy Place, Pensacola, Florida, 32520

8
9 Q. By whom are you employed and in what capacity?

10 A. I am employed by Gulf Power Company as the Manager of
11 Environmental Affairs.

12
13 Q. Mr. Vick, will you please describe your education and
14 experience?

15 A. I graduated from Florida State University, Tallahassee,
16 Florida, in 1975 with a Bachelor of Science Degree in
17 Marine Biology. I also hold a Bachelor's Degree in Civil
18 Engineering from the University of South Florida in Tampa,
19 Florida. In addition, I have a Masters of Science Degree
20 in Management from Troy State University, Pensacola,
21 Florida. I joined Gulf Power Company in August 1978 as an
22 Associate Engineer. I have since held various engineering
23 positions such as Air Quality Engineer and Senior
24 Environmental Licensing Engineer. In 1996, I assumed my
25 present position as Manager of Environmental Affairs.

1 Q. What are your responsibilities with Gulf Power Company?

2 A. As Manager of Environmental Affairs, my primary
3 responsibility is overseeing the activities of the
4 Environmental Affairs section to ensure the Company is,
5 and remains, in compliance with environmental laws and
6 regulations, i.e., both existing laws and such laws and
7 regulations that may be enacted or amended in the future.
8 In performing this function, I have the responsibility for
9 numerous environmental activities.

10

11 Q. Are you the same James O. Vick who has previously
12 testified before this Commission on various environmental
13 matters?

14 A. Yes.

15

16 Q. What is the purpose of your testimony in this proceeding?

17 A. The purpose of my testimony is to support Gulf Power
18 Company's projection of environmental compliance amounts
19 recoverable through the Environmental Cost Recovery Clause
20 (ECRC) for the period January 1999 through December 1999.
21 I will discuss the amounts included in the projection
22 period for those compliance activities previously approved
23 by the Commission along with one new capital project. I
24 will also present testimony on the variances identified in
25 the estimated true-up periods from October 1997 through

1 September 1998 and October 1998 through December 1998.

2

3 Q. Mr. Vick, do you have an exhibit to which you will refer?

4 A. Yes, I have.

5

6

7

8

9

Counsel: We ask that Mr. Vick's Exhibit
Consisting of a copy of Chapter 62-4.246,
F.A.C. be marked as Exhibit No. _____
(JOV-1).

10 Q. Mr. Vick, please identify the capital projects included in
11 Gulf's ECRC calculations.

12 A. A listing of the environmental capital projects which have
13 been included in Gulf's ECRC calculations has been
14 provided to Ms. Cranmer and is included in Schedules 42-3P
15 and 42-4P of her testimony. Schedule 42-4P reflects the
16 expenditures, clearings, retirements, salvage and cost of
17 removal currently projected for each of these projects.
18 These amounts were provided to Ms. Cranmer, who has
19 compiled the schedules and calculated the associated
20 revenue requirements for our requested recovery. All but
21 one of the listed projects are associated with
22 environmental compliance activities which have been
23 previously approved for recovery through the ECRC by this
24 Commission in Docket No. 930613-EI and past proceedings in
25 this ongoing recovery docket.

1 Q. Mr. Vick, what new capital project is included in this
2 testimony for which recovery has yet to approved by this
3 Commission?

4 A. The new capital project, Crist Units 4 - 7 Ash Pond
5 Diversion Curtains, is an environmental project that meets
6 the specific requirements for inclusion in ECRC. Pursuant
7 to Chapter 62-4.246, F.A.C. (Exhibit JOV-1, attached), the
8 Florida Department of Environmental Protection (FDEP) has
9 adopted new analytical methods which lower the Method
10 Detection Limits (MDLs) and Practical Quantification
11 Limits (PQLs) for each constituent or substance included
12 in permit-required monitoring. This, in effect, lowers
13 the quantification limits for metals analysis. For
14 example, our historical contract laboratory has previously
15 used a MDL for copper of 0.01 mg/l and a PQL of 0.01 mg/l;
16 the revised MDLs and PQLs now make those limits for copper
17 .001 mg/l and .005 mg/l, respectively. These MDLs and
18 PQLs have been included in the draft National Pollution
19 Discharge Elimination System (NPDES) renewal permit at
20 Plant Crist which is expected to be finalized and issued
21 during the last quarter of 1998. Due to the fact that the
22 Company must meet the much lower detection limits now
23 required by Chapter 62-4.246, F.A.C., it becomes critical
24 that the Company reduce the possibility of discharges of
25 metal constituents from the outfall at the Plant Crist ash

1 pond. The installation of additional flow diversion
2 curtains in the Plant Crist ash pond will effectively
3 increase retention time in the ash pond, thereby allowing
4 for the sedimentation/precipitation treatment process to
5 be more effective.

6
7 Q. Please compare the Environmental Operation and Maintenance
8 (O&M) activities listed on Schedule 42-2P of Exhibit SDC-1
9 to the O&M activities approved for cost recovery in past
10 ECRC dockets.

11 A. The O&M activities listed on Schedule 42-2P have all been
12 approved for recovery through the ECRC in past
13 proceedings. These O&M activities are all on-going
14 compliance activities and can be grouped into four major
15 categories-Air Quality, Water Quality, Environmental
16 Programs Administration, and Solid and Hazardous Waste. A
17 discussion of each O&M activity within each of these major
18 categories and the projected expenses follows in my
19 testimony.

20
21 Q. What O&M activities are included in the Air Quality
22 category?

23 A. There are six O&M activities included in this category:

24 The first, Sulfur/Ammonia (Line Item 1.1), reflects
25 operational expenses associated with the burning of low

1 sulfur coal. This item refers to the flue gas sulfur
2 injection system needed to improve the collection
3 efficiency of the Crist Unit 7 electrostatic precipitator
4 and is required due to the burning of low sulfur coal at
5 this unit pursuant to the sulfur dioxide requirements of
6 the Clean Air Act Amendments (CAAA). The expenses
7 projected for the recovery period total \$10,500.

8 The second activity listed on Schedule 42-2P, Air
9 Emission Fees (Line Item 1.2), represents the expenses
10 projected for the annual fees required by the CAAA. The
11 expenses projected for the recovery period total \$149,332.

12 The third activity listed on Schedule 42-2P, Title V
13 Permits (Line Item 1.3), represents projected expenses
14 associated with the implementation of the Title V permits.
15 The total estimated expense for the Title V Program during
16 the recovery period is \$10,000.

17 The fourth activity listed on Schedule 42-2P,
18 Asbestos Fees (Line Item 1.4), is required to be paid to
19 the FDEP for the purpose of funding the state's asbestos
20 removal program. The expenses projected for the recovery
21 period total \$5,000.

22 The fifth activity listed on Schedule 42-2P, Emission
23 Monitoring (Line Item 1.5), reflects an ongoing O&M
24 expense associated with the new Continuous Emission
25 Monitoring equipment (CEM) as required by the CAAA. These

1 expenses are incurred in response to the federal
2 Environmental Protection Agency's (EPA) requirements that
3 the Company perform Quality Assurance/Quality Control
4 (QA/QC) testing for the CEMs, including Relative Accuracy
5 Test Audits (RATA) and Linearity Tests. The expenses
6 projected to occur during the recovery period for these
7 activities total \$454,800.

8 The sixth activity listed in the Air Quality
9 category, Low NOx (Line Item 1.13), reflects the most
10 recent Commission-approved activity, the installation of
11 Low NOx burner tips at our generating plants. Projected
12 expenses in 1999 for this activity total \$1,301,112 and
13 include Plant Crist Unit 5 and Plant Smith Units 1 and 2.
14

15 Q. What O&M activities are included in Water Quality?

16 A. General Water Quality (Line Item 1.6), identified in
17 Schedule 42-2P, includes Soil Contamination Studies,
18 Dechlorination, Groundwater Monitoring Plan Revisions and
19 Surface Water Studies. All of the on-going programs
20 included in Line Item 1.6, General Water Quality, have
21 been approved in past proceedings. The expenses projected
22 to occur during the recovery period for these activities
23 total \$414,990.

24 The second activity in the Water Quality Category,
25 Groundwater Contamination Investigation (Line Item 1.7),

1 was previously approved for environmental cost recovery in
2 Docket No. 930613-EI. This on-going activity is projected
3 to incur incremental expenses totaling \$1,182,627 during
4 the recovery period.

5 Line Item 1.8, State NPDES Administration, was
6 previously approved for recovery in the ECRC and reflects
7 expenses associated with annual fees for Gulf's three
8 generating facilities. These expenses are expected to be
9 \$49,500 during the recovery period.

10 Finally, Line Item 1.9, Lead and Copper Rule, was
11 also previously approved for ECRC recovery and reflects
12 sampling, analytical and chemical costs related to lead
13 and copper in drinking water. These expenses are expected
14 to total \$12,000 during 1999.

15
16 Q. What activities are included in the Environmental Affairs
17 Administration Category?

18 A. Only one O&M activity is included in this category on
19 Schedule 42-2P (Line Item 1.10) of my exhibit. This Line
20 Item refers to the Company's Environmental
21 Audit/Assessment function. This program is an on-going
22 compliance activity previously approved and is projected
23 to incur expenses totaling \$23,772 during the recovery
24 period.

25

1 Q. What O&M activities are included in the Solid and
2 Hazardous Waste category?

3 A. Only one program, General Solid and Hazardous Waste (Line
4 Item 1.11), is included in the Solid and Hazardous Waste
5 category on Schedule 42-2P. This activity involves the
6 proper identification, handling, storage, transportation
7 and disposal of solid and hazardous wastes as required by
8 Federal and State regulations. This program is an on-
9 going compliance activity previously approved and is
10 projected to incur incremental expenses totaling \$170,508
11 during the recovery period.

12
13 Q. What activities are included in the Above Ground Storage
14 Tanks program?

15 A. Only one O&M activity is included in this category on
16 Schedule 42-4P (Line Item 1.12). This activity has been
17 previously approved by the Commission and reflects
18 expenses for inspection and integrity testing of field-
19 erected above ground storage tank systems for hazardous
20 pollutants, i.e., petroleum fuel products. This program
21 is projected to incur expenses totaling \$25,000 during the
22 recovery period.

23
24 Q. What significant variances do you anticipate related to
25 Gulf's environmental capital costs in the estimated true-

1 up period October 1997 through September 1998?

2 A. As reflected in Ms. Cranmer's schedule 42-6E-1, the
3 recoverable capital costs included in estimated true-up
4 calculation total \$7,900,302, as compared to the original
5 projected amount of \$8,616,006. This resulted in a
6 variance of (\$715,704).

7
8 Q. Have there been any changes that resulted in variances to
9 all capital projects?

10 A. Yes. Order No. PSC-98-0921-FOF-EI dated July 7, 1998
11 outlined new depreciation rates, amortization schedules,
12 and dismantlement accruals effective January 1, 1998. Ms.
13 Cranmer has reflected these changes in her calculations,
14 which created a variance in virtually every capital
15 project included for cost recovery, including significant
16 variances for Crist 5, 6, & 7 Precipitator Projects (Line
17 1.2), Daniel Ash Management Project (Line 1.14), and the
18 Underground Fuel Tank Replacement (Line Item 1.15).

19
20 Q. What capital projects other than those specifically
21 mentioned above contributed significantly to the
22 (\$715,704) variance in the October 1997 through September
23 1998 recovery period?

24 A. Three projects contributed significantly to this variance.
25 The first, Low NOx Burners, Crist 6 & 7 (Line Item

1 1.4) reflects a variance of \$52,478. The variance is from
2 a negotiated agreement with a vendor which resulted in a
3 project credit that occurred in December 1997, offset by
4 an increase in depreciation expense.

5 The second project, Substation Contamination Mobile
6 Groundwater Treatment System (Line Item 1.6) reflects a
7 variance of \$13,710, which is the result of the purchase
8 of an additional mobile groundwater treatment system.
9 This system was purchased because the existing mobile
10 groundwater treatment system previously approved by the
11 Commission does not have adequate water treatment capacity
12 for other sites which require remediation.

13 Finally, SO2 Allowances (Line Item 1.16) reflects a
14 variance of (\$1,077,434). Two events have contributed to
15 this variance. First, the proceeds from the spring
16 allowance auction are unpredictable from year to year and
17 therefore were not budgeted. Secondly, Gulf took
18 advantage of an unforeseen opportunity to sell some
19 emission allowances from its bank that the Company deemed
20 were in excess of current or projected needs. This
21 transaction was completed in August, 1998 at fair market
22 value. The gain from this transaction is being realized
23 during the remaining months of 1998 (September through
24 December).

25

1 Q. What significant variances do you anticipate for Gulf's
2 environmental Operation and Maintenance (O&M) activities
3 listed on Schedule 42-4E-1 in the estimated true-up period
4 October 1997 through September 1998.

5 A. The O&M activities listed on Schedule 42-4E-1 have all
6 been approved for cost recovery in past ECRC dockets.
7 This schedule reflects that Gulf now projects a total of
8 \$3,246,861 in recoverable O&M expenses for the period
9 October 1997-September 1998, compared to the amount
10 included in the original projection of \$3,550,964. This
11 is expected to result in a variance of (\$304,103). I will
12 address nine O&M projects/programs that contributed to
13 this variance.

14
15 Q. Please explain the variance in the Sulfur category (Line
16 Item 1.1).

17 A. As discussed in previous testimony in this docket, this
18 category reflects operational expenses associated with the
19 burning of low sulfur coal and refers to the flue gas
20 conditioning system on Crist Unit 7. The use of sulfur is
21 entirely dependent upon the quality of a low sulfur coal
22 supply. During the recovery period, the flue gas
23 conditioning system was activated due to the coal supply
24 and expenses of \$8,499 were incurred.

25

1 Q. Please explain the (\$74,166) variance in the Air Emission
2 Fees category (Line Item 1.2).

3 A. This variance is the result of a reduction in Gulf's
4 proportionate share of Plant Daniel's annual air emission
5 fees.

6
7 Q. Please explain the (\$12,614) variance in the Title V
8 program (Line Item 1.3).

9 A. Title V permits remain in draft form as the FDEP has yet
10 to issue final permits. We expect a re-issue of our draft
11 Title V permits for Plants Crist, Smith and Scholz during
12 the October 1998 through December 1998 recovery period.

13
14 Q. Please explain the (\$47,007) variance in the Emission
15 Monitoring category (Line Item 1.5).

16 A. Due to better than expected performance of the Continuous
17 Emission Monitoring (CEMs), there were fewer Relative
18 Accuracy Test Audits (RATA's) performed during the period,
19 which accounts for the variance.

20
21 Q. Please explain the (\$140,331) variance in the General
22 Water Quality (Line Item 1.6) category.

23 A. This variance results from activities associated with the
24 ECRC approved Surface Water Studies conducted at Plants
25 Crist, Smith and Scholz. This program is a NPDES

1 required biological integrity study and is conducted
2 during the summer months (July, August, September) when
3 estuarine systems are the most stressed due to low-flow
4 and high thermal conditions. Data retrieved during these
5 months will be compiled into an annual report which will
6 be submitted to the FDEP. Expenses for this program were
7 projected to be incurred in the period ending September
8 1998; however, these expenses were delayed and are now
9 projected for the October 1998 through December 1998
10 period. We anticipate these expenses to be on target by
11 the end of the fifteen-month period from October 1997
12 through December 1998.

13
14 Q. Please explain the \$366,269 variance in the Groundwater
15 Contamination Investigation (Line Item 1.7).

16 A. During the recovery period, Gulf has excavated
17 contaminated soils at five substation locations within our
18 service territory. The aerial extent of soil
19 contamination was larger than expected and associated
20 excavation and soil disposal costs were higher than
21 anticipated.

22
23 Q. Please explain the (\$100,306) variance in the General
24 Solid and Hazardous Waste category (Line Item 1.11).

25 A. Expenses in this category fluctuate and are proportional

1 to the quantities of solid and hazardous waste materials
2 generated which require proper disposal. There were less
3 quantities of waste generated during the period than were
4 anticipated.

5
6 Q. Please explain the (\$765,000) variance in the Above Ground
7 Storage Tanks category (Line Item 1.12).

8 A. Contractor bids have been received and are less than
9 originally anticipated. Preliminary work was begun in
10 September. Consequently, due to the delays and new
11 estimates, expenses will be less than originally projected
12 for the October 1997 through September 1998 recovery
13 period. The majority of the expenses related to this
14 activity are projected to occur in the October 1998
15 through December 1998 transitional period.

16
17 Q. Please explain the \$460,096 variance in the Low NOX
18 category (Line Item 1.13).

19 A. This project refers to the purchase and installation costs
20 of Low NOx burner tips on Plant Crist Units 4 & 5 in order
21 to comply with Phase II requirements of the CAA. Expenses
22 for this project were not included in the original
23 projection testimony. The Commission recently approved
24 the Plant Crist Units 4 & 5 Low NOx burner tips purchase
25 and installation costs. The burners and tips for Plant

1 Crist Unit 4 have been installed and are operational.

2

3 Q. Mr. Vick, are there significant variances or have there
4 been any changes that resulted in variances for either
5 capital or O&M expense reflected on Ms. Cranmer's Schedule
6 42-4E-2 or 42-6E-2 for the estimated transitional period
7 October 1998- December 1998?

8 A. Yes.

9 First, and as mentioned earlier in my testimony,
10 Order No. PSC-98-0921-FOF-EI dated July 7, 1998 outlined
11 new depreciation rates, amortization schedules, and
12 dismantlement accruals effective January 1, 1998. Ms.
13 Cranmer has reflected these changes in her calculations
14 which created a variance in virtually every capital
15 project included for cost recovery.

16 In addition, SO2 Allowances (Line Item 1.16) reflects
17 a variance of (\$2,887,810). As previously mentioned, Gulf
18 Power sold a quantity of emission allowances that the
19 Company deemed were in excess of current or projected
20 needs. The gain from this transaction is being realized
21 during the remaining months of 1998 (September through
22 December).

23 There are five O&M projects that also are expected to
24 have variances during the transitional period.

25 First, Emission Monitoring (Line Item 1.5) reflects a

1 variance of \$8,800. This is due to a delay of project
2 expenses from September to October 1998.

3 Secondly, Groundwater Contamination Investigation
4 (Line Item 1.7) reflects a variance of (\$31,140). This
5 variance is due to accelerated activities at several sites
6 in the period October 1997 through September 1998.

7 General Water Quality (Line 1.6) reflects a \$140,331
8 variance. As I mentioned earlier in my testimony,
9 expenses budgeted for the October 1997 through September
10 1998 period have been delayed until the October 1998
11 through December 1998 period.

12 General Solid and Hazardous Waste (Line Item 1.11)
13 reflects a variance of \$23,796. Expenses in this category
14 fluctuate and are proportional to the quantities of solid
15 and hazardous waste materials generated which require
16 proper disposal. It is expected that greater quantities
17 of waste will be generated during the period than were
18 anticipated.

19 Finally, Above Ground Storage Tanks (Line Item 1.12)
20 reflects a variance of (\$156,000) for the October 1998-
21 December 1998 recovery period. As discussed earlier in my
22 testimony, contractor bids have been received and are less
23 than originally anticipated. Preliminary work was begun
24 in September. Consequently, due to the delays and new
25 estimates, expenses will be less than originally projected

1 for the October 1998 through December 1998 recovery
2 period.

3

4 Q. Does this conclude your testimony?

5 A. Yes.

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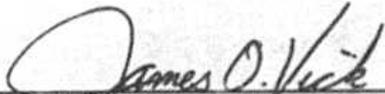
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STATE OF FLORIDA)
COUNTY OF ESCAMBIA)

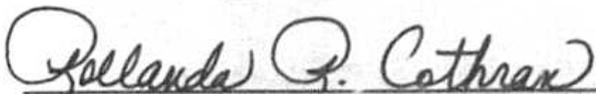
Docket No. 980007-EI

Before me the undersigned authority, personally appeared James O. Vick, who being first duly sworn, deposes, and says that he is the Manager of Environmental Affairs of Gulf Power Company, a Maine corporation, and that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.



James O. Vick
Manager of Environmental Affairs

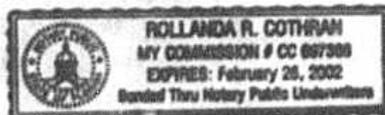
Sworn to and subscribed before me this 8th day of October, 1998.



Notary Public, State of Florida at Large

Commission Number:

Commission Expires:



PERMITS

DEP 62-4.244(7)(c)1.

6/96

PART II: SPECIFIC PERMITS; REQUIREMENTS

1. No discharger may be issued more than one permit or permit modification or renewal which allows a modification pursuant to this subsection unless the applicant affirmatively demonstrates that it has undertaken a continuing program, approved by the Department, designed to consider water quality conditions and review or develop any reasonable means of achieving compliance with the water quality criteria from which relief has been granted pursuant to this subsection.

2. With respect to Paragraphs 62-4.244(1)(c), F.A.C., and 62-4.244(7)(c), F.A.C., the applicant must affirmatively demonstrate the minimum area of the water body necessary to achieve compliance with either subsection. Within a minimum area determined by the Secretary to be necessary to achieve compliance, the discharger shall be exempt from the criterion for which a demonstration has been made.

(d) Whenever site-specific alternative criteria are established pursuant to Rule ¹⁵ 62-3.031, Florida Administrative Code, or Paragraph ²¹ 62-3.061(2)(g), Florida Administrative Code, a mixing zone may be issued for dissolved oxygen if all provisions of Rule 62-4.244, Florida Administrative Code, are met with the exception of Subparagraph 62-4.244(1)(j)1., Florida Administrative Code.

Specific Authority: 403.061, 403.062, 403.087, 403.504, 403.704, 403.804, 403.805, F.S.
Law implemented: 403.021, 403.061, 403.087, 403.088, ⁹ 403.101, 403.121, 403.141, 403.161, 403.182, 403.201, 403.502, 403.702, 403.708, F.S.
History: Formerly part of 17-3.05, Revised and Renumbered 3-1-79, Amended 10-2-80, 1-1-83, 2-1-83, 2-19-84, 4-26-87, 8-31-88, 10-17-90, Formerly 17-4.244.

62-4.246 Sampling, Testing Methods, and Method Detection Limits for Water Pollution Sources.

(1) The Department shall require monitoring and sampling for pollutants reasonably expected to be contained in the discharge and to violate the water quality criteria in Chapter 62-302, F.A.C.

(2) Field testing, sample collection and preservation, laboratory testing, including quality control procedures, and all record keeping shall comply with Chapter 62-160, F.A.C.

(3) Subsections (4)-(11) of this rule apply only to permit applications, permits, monitoring reports, and other sources of data relating to discharges to surface waters.

(4) Using generally accepted scientific procedures, the Department shall establish and publish a method detection limit (MDL) and practical quantification limit (PQL) for each approved analytical method for a parameter (including any pollutant). On request, the Department shall make available a list of all current established MDLs and PQLs. The permittee may request and the Department shall consider approval for alternative methods or for alternative MDLs and PQLs for any approved analytical method, in accordance with the criteria of Rules ³⁰ 62-160.520 (New Methods, Validation Requirements) and ³⁰ 62-160.530 (Approval of Alternate Test Procedures), F.A.C. Permit applications, permits, and monitoring reports shall specify the applicable MDL and PQL established by the Department for each pertinent parameter.

PERMITS

DEP 62-4.246(5)

6/96

PART II: SPECIFIC PERMITS; REQUIREMENTS

(5) When establishing effluent limits in accordance with Rule 62-650, F.A.C., for pollutants for which MDLs are higher than the established water quality criteria, the Department shall base the limits on concentrations in the receiving waters computed in accordance with generally accepted scientific procedures and with Subsections (8), (10) and (11) of this section. Permit applications and monitoring reports shall identify results below the MDL. Except as specified in Subsections (8) and (10) below, such results shall demonstrate compliance for that pollutant.

(6) All results submitted to the Department for permit applications and monitoring shall be reported as follows.

(a) The approved analytical method and corresponding Department-established MDL and PQL levels shall be reported for each pollutant. The MDLs and PQLs incorporated in the permit shall constitute the minimum reporting levels for each parameter for the life of the permit. The Department shall not accept results for which the laboratory's MDLs or PQLs are greater than those incorporated in the permit. All results with laboratory MDLs and PQLs lower than those established in the permit shall be reported to the Department. Unless otherwise specified, all subsequent references to MDL and PQL pertain to the MDLs and PQLs incorporated in the permit.

(b) Results greater than or equal to the PQL shall be reported as the measured quantity.

(c) Results less than the PQL and greater than or equal to the MDL shall be reported as less than the PQL and deemed to be equal to the MDL.

(d) Results less than the MDL shall be reported as less than the MDL.

(e) The following table is intended as a guide in the use of Subsections (6)(b)-(d) for determining compliance with permit limits. Common abbreviations used in this table are as follows:

PQL means practical quantification limit

MDL means method detection limit

> means greater than

< means less than

= means equal to.

**Table 1
 COMPLIANCE DETERMINATION**

PERMIT LIMIT	DATA	COMPLIANCE	NONCOMPLIANCE
(6)(b) Greater Than or Equal to PQL	> Permit Limit		*
	< or = Permit Limit	*	