

# AUSLEY MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET  
P.O. BOX 391 (ZIP 32302)  
TALLAHASSEE, FLORIDA 32301  
(850) 224-9115 FAX (850) 222-7560

September 21, 2016

**VIA: ELECTRONIC FILING**

Ms. Carlotta S. Stauffer  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Recovery of Development and Implementation Costs of a Plan of Study to Ensure Compliance with New Arsenic Standard; Docket No. 160007-EI

Dear Ms. Stauffer

On February 23, 2006 the Commission entered its Order No. PSC-06-0138-PAA-EI in Docket No. 050683-EI conditionally approving Tampa Electric's recovery through the Environmental Cost Recovery Clause ("ECRC") its development and implementation costs associated with a plan of study ("POS") to ensure compliance with a new groundwater arsenic standard at Big Bend Station. A copy of that order is attached hereto as Exhibit "A". The conditions for recovery were that Tampa Electric provide evidence that Big Bend Station's new industrial wastewater permit requires Tampa Electric to develop and implement a POS to ensure compliance with the new arsenic standard. The order stated that once this condition is met, the costs of developing the study shall be eligible for recovery through the ECRC. The order further states that once the POS is approved by the Florida Department of Environmental Regulation ("FDEP"), the costs of implementing it shall be eligible for recovery through the ECRC. The order stated that these conditions could be verified concurrent with the review and audit activities in the on-going ECRC docket.

Attached hereto as Exhibit "B" is an excerpt from a January 24, 2007 letter from FDEP to Tampa Electric requiring Tampa Electric to submit a POS within six months of the effective date of the Remedial Action Plan ("RAP") to comply with the groundwater quality standard for arsenic and further providing a period of 24 months from the approval of the POS to implement the appropriate technology so that wastewater discharge will be in compliance with the new arsenic standard.

Attached hereto as Exhibit "C" is a copy of the July 24, 2007 letter from Tampa Electric transmitting the POS to FDEP. The POS itself is omitted as it is quite bulky, but is available for review if necessary. After that POS was submitted, FDEP suggested that Tampa Electric complete lining the holding ponds at Big Bend Station, to see if that action would eliminate the

Ms. Carlotta S. Stauffer  
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Page Two

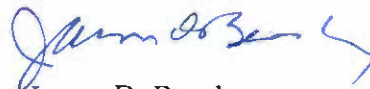
issue. When arsenic levels continued to exceed the limits after the ponds were lined, a revised POS became necessary. That is why this has been a lengthy process.

Attached hereto as Exhibit "D" is a copy of an email from Tampa Electric to FDEP (reflecting Tampa Electric's transmission of a revised POS to FDEP on August 18, 2016) and a September 14, 2016 reply from FDEP's Ramandeep Kaur stating that FDEP had completed its review of the revised POS for Big Bend Station and it has been approved.

The attached documents establish that the POS has been required and approved by FDEP, thus making the costs of developing and implementing the POS eligible for recovery through the ECRC. Tampa Electric will be incurring these costs during the remainder of 2016 and 2017. Since none of the costs associated with the development and implementation of the POS are included in Tampa Electric's projections for ECRC cost recovery in 2017, Tampa Electric will include these costs in its true-up calculations for 2016 and 2017.

Thank you for your assistance in connection with this matter.

Sincerely,



James D. Beasley

JDB/pp  
Attachments

cc: All Parties of Record (w/attachments)

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for approval of new environmental program for cost recovery through Environmental Cost Recovery Clause, by Tampa Electric Company.

DOCKET NO. 050683-EI  
ORDER NO. PSC-06-0138-PAA-EI  
ISSUED: February 23, 2006

The following Commissioners participated in the disposition of this matter:

LISA POLAK EDGAR, Chairman  
J. TERRY DEASON  
ISILIO ARRIAGA  
MATTHEW M. CARTER II  
KATRINA J. TEW

NOTICE OF PROPOSED AGENCY ACTION  
ORDER ON COST RECOVERY THROUGH THE ENVIRONMENTAL COST RECOVERY  
CLAUSE

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

On September 29, 2005, Tampa Electric Company ("TECO" or "Company") petitioned for approval of a new Arsenic Groundwater Standard Program for cost recovery through the Environmental Cost Recovery Clause ("ECRC" or "statute"). TECO is proposing the program to comply with new arsenic standards required by the Florida Department of Environmental Protection ("DEP"). The new standards are contained in Rule 62-550.310, Florida Administrative Code ("F.A.C."), concerning Drinking Water Standards, Monitoring and Reporting, and Rule 62-520.420(1), F.A.C., concerning Groundwater Classes, Standards and Exemptions.

Section 366.8255, Florida Statutes, authorizes us to review and decide whether a utility's environmental compliance costs are recoverable through an environmental cost recovery factor. Electric utilities may petition to recover projected new environmental compliance costs required by environmental laws or regulations, not included in base rates. Environmental laws or regulations include "all federal, state, or local statutes, administrative regulations, orders, ordinances, resolutions, or other requirements that apply to electric utilities and are designed to

DOCUMENT NUMBER-DATE

01562 FEB 23 06

Exhibit "A"

FPSC-COMMISSION CLERK

protect the environment.” Section 366.8255(1)(c), Florida Statutes. Only prudently incurred costs may be recovered through the clause. Section 366.8255(2), Florida Statutes.

On June 7, 2005, the DEP issued TECO an Industrial Wastewater (“IWW”) Facility Permit, Permit Number FLA 184713-006-IWIN, to operate a wastewater treatment system at Bayside Power Station. Attached to the IWW permit is an Administrative Order. The Administrative Order cites the change in the groundwater quality standard for arsenic as the basis of a new compliance requirement. To meet the new arsenic standard, TECO is required to develop and implement a treatment plan, or a “plan of study.” The plan of study is required to be submitted to DEP within six months of permit issuance for DEP’s approval. TECO’s petition for the Arsenic Groundwater Standard Program seeks to recover the costs of developing and implementing the plan of study.

TECO has shown that its Arsenic Groundwater Standard Program at Bayside is legally required to comply with a new governmentally imposed environmental regulation. The costs of developing the plan of study for Bayside shall be eligible for recovery. After the plan of study is approved by DEP, the costs of implementing the plan of study shall be found eligible for recovery through the ECRC.

The new arsenic standard also applies to TECO’s Polk Power Station and Big Bend Power Station. According to TECO, Polk Power Station is already in compliance with the new standard. The company anticipates an IWW permit for Big Bend Station to be issued in 2006 which will contain requirements similar to those contained in Bayside Power Station’s IWW permit.

Although there currently is no administrative order requiring the implementation of the new arsenic standard for the Big Bend Station at this time, administrative efficiency will be gained by considering the Arsenic Groundwater Standard Program for Bayside and Big Bend at the same time. TECO has shown that there is a high probability that Big Bend will be subject to the new compliance requirements associated with the new arsenic standard in 2006. TECO understands that it will need to provide the IWW permit for the Big Bend Station for verification as a condition for future cost recovery. Such verification can be conducted concurrent with the review and audit activities in the ongoing ECRC docket. ✓

TECO has shown that there is a high probability that Big Bend will be required to develop a plan of study as part of its IWW permit renewal. Recovery of the cost of developing the plan of study and implementing it shall be found conditionally eligible for approval. Before TECO incurs any costs that it wants to pass through the ECRC, it shall provide evidence that Big Bend’s new IWW permit requires TECO to develop and implement a plan of study to ensure compliance with the new arsenic standard. Once this condition is met, the costs of developing the study would be eligible for recovery through the ECRC. Once the plan of study is approved by DEP, the costs of implementing it would be eligible for recovery through the ECRC.

Based on the assumption that Big Bend’s new IWW permit will have a requirement like that of Bayside’s, TECO projects the following program costs, which include the actual costs incurred in 2005:



Table 1  
TECO's Arsenic Groundwater Standard Program Costs

| Affected Power Plants | O&M Expenses  |                  |                  |
|-----------------------|---------------|------------------|------------------|
|                       | 2005 (Actual) | 2006 (Projected) | 2007 (Projected) |
| Bayside               | \$21,145      | \$45,000         | \$30,000         |
| Big Bend              | 0             | \$51,000         | \$84,000         |
| Total                 | \$21,145      | \$96,000         | \$114,000        |

The current ECRC factors approved by Order No. PSC-05-1251-FOF-EI, in Docket No. 050007-EI, issued December 22, 2005, In re: Environmental cost recovery clause, do not include the costs associated with TECO's Arsenic Groundwater Standard Program. By this order, we approved a stipulation regarding Progress Energy Florida's request for recovery of costs to assess groundwater arsenic levels and consultant costs for development of an arsenic remediation plan at Plants Anclote, Bartow, Hines, and Crystal River. TECO proposes that all activity costs incurred subsequent to the filing of this petition will be included in its ECRC true-up filings and projection filing in 2006.

TECO has incurred quarterly monitoring costs to comply with the existing arsenic standard. These ongoing monitoring costs are recovered through base rates, thus, they are not eligible for recovery through the ECRC. TECO confirms that the company does not seek to recover such ongoing monitoring costs through the ECRC.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that, costs incurred by Tampa Electric to develop the plan of study for Bayside's Groundwater Standard Program are eligible for recovery through the Environmental Cost Recovery Clause. After the plan of study has been approved by the Department of Environmental Protection, the costs of implementing the plan of study shall be eligible for recovery through the ECRC. It is further

ORDERED that recovery of the costs of developing and implementing the plan of study for Big Bend are conditionally eligible for recovery. Before Tampa Electric incurs any costs that it wants to pass through the Environmental Cost Recovery Clause it shall provide evidence that Big Bend's new industrial wastewater permit requires Tampa Electric to develop and implement a plan of study to ensure compliance with the new arsenic standard. Once this condition is met, the costs of developing the study shall be eligible for recovery through the Environmental Cost Recovery Clause. Once the plan of study is approved by the Department of Environmental Regulation, the costs of implementing it shall be eligible for recovery through the Environmental Cost Recovery Clause. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by

1. Develop
2. Implement

ORDER NO. PSC-06-0138-PAA-EI  
DOCKET NO. 050683-EI  
PAGE 4

the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall be closed.

By ORDER of the Florida Public Service Commission this 23rd day of February, 2006.

BLANCA S. BAYÓ, Director  
Division of the Commission Clerk  
and Administrative Services

By: Kay Flynn  
Kay Flynn, Chief  
Bureau of Records

(SEAL)

MKS

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

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DOCKET NO. 050683-EI  
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The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on .

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.



# Florida Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kotkamp  
Lt. Governor

Michael W. Sole  
Secretary

CERTIFIED MAIL 7004 1350 0002 5571 4619  
RETURN RECEIPT REQUESTED

January 24, 2007

**RECEIVED**

JAN 25 2007

Environmental, Health  
and Safety

Mr. Hugh W. Smith, Vice-President  
Tampa Electric Company, Energy Supply Trading and Service  
P.O. Box 111  
Tampa, FL 33601-0111

Re: TEC Big Bend Facility, 13031 Wyandotte Road, Hillsborough County  
OGC Consent Order 00-1275 and IW Permit # FLA017047-002-IW1N

Dear Mr. Smith:

The Department has completed its review of the information contained in the ECAP and addendums to the ECAP submitted to the Department pursuant to paragraph 16 of Consent Order 00-1275, the information submitted with and in support of the application to renew the Industrial Waste Water Permit identified above, and the proposed Remedial Action Plan (RAP), and the site wide Groundwater Monitoring Plan. Our review also included an evaluation of surface water quality data generated by both the Department staff and TEC's consultants from samples of the surface waters immediately surrounding the industrial wastewater and waste management units at the TEC Big Bend Facility. The Remedial Corrective Plan is required pursuant to paragraph #16 and attachment #2 in Consent Order 00-1275 and §403.088(2)(f), F.S.

TEC's Remedial Action Plan and Groundwater Monitoring Plan, attached hereto is approved and is authorized to be implemented by the execution of this letter. Any additional information requested by the Department to evaluate the submittals provided by TEC in the implementation of the RAP shall be provided to the Department in accordance with paragraph 17 of Attachment #2 to Consent Order 00-1275.

As provided by Paragraph #19 of Attachment #2 of Consent Order 00-1275, once a RAP has been approved by the Department, it shall become effective and made a part of the Order and shall be initiated according to the schedules included in the RAP. All reporting and notification requirements spelled out in Part 6 of Attachment #2 to Consent Order 00-1275 shall be complied with during the implementation of the RAP tasks.

Exhibit "B"

Water Protection and Process  
www.dep.state.fl.us



This RAP approval by the Department, will constitute the Order required by §403.088 (2)(f), F.S., and with the execution of this letter, the Department intends to issue TEC an Intent to Issue the permit to continue the operation of the Industrial wastewater system at Big Bend while the corrective actions to return the facility to compliance are implemented and completed. The proposed draft permit intent will be sent to TEC for review as soon as it is prepared.

With regard to this agency action taken by the Department concerning Respondent's proposed RAP submitted by the Respondent to the Department as required by the terms of Paragraphs 16, 22 and 23, Respondent may file a Petition for Formal or Informal Administrative Hearing. If Respondent objects to the Department's agency action pursuant to Sections 120.569 and 120.57, Florida Statutes, Respondent shall have the burden to establish the inappropriateness of the Department's agency action. The petition must contain the information set forth in paragraph 28 and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days of receipt of the Department's agency action the Respondent intends to challenge and must conform with the requirements of Florida Administrative Code Rule 28-106.201 or Rule 28-106.301. Failure to file a petition within this time period shall constitute a waiver by Respondent of its right to request an administrative proceeding under Sections 120.569 and 120.57, Florida Statutes. The Department's determination, upon expiration of the 21 day time period if no petition is filed, or the Department's Final Order as a result of the filing of a petition, shall be incorporated by reference into this Consent Order and made a part of it. All other aspects of this Consent Order shall remain in full force and effect at all times. If both parties agree, the Department and Respondent may mediate the dispute as provided in Section 120.572, Florida Statutes. If the parties agree to mediation, the time for filing a petition pursuant to this paragraph is tolled until such time as the mediation is unsuccessful. Upon notice from the Department that the mediation is unsuccessful, the Respondent shall have 21 days to file its petition as provided herein.

If Respondent seeks an administrative proceeding pursuant to this paragraph, the Department may file suit, including injunctive relief, against Respondent in lieu of or in addition to holding the administrative proceeding to obtain judicial resolution of all the issues unresolved at the time of the request for administrative proceeding.

#### Notice of Rights

Persons who are not parties to this RAP and Groundwater Monitoring Plan approval but whose substantial interests are affected by this RAP or Groundwater Monitoring Plan approval have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3400, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the District Office named above at the address indicated. Failure to file a petition within the 21 days

constitutes a waiver of any right such person has to an administrative hearing pursuant to Section 120.57, Florida Statutes.

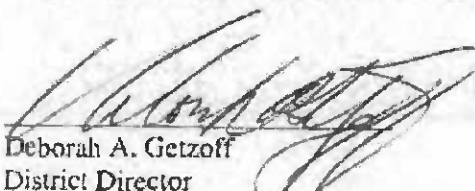
The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the Department's Consent Order identification number and the county in which the subject matter or activity is located; (b) A statement of how and when each petitioner received notice of the Consent Order; (c) A statement of how each petitioner's substantial interests are affected by the Consent Order; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Consent Order; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Consent Order; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Consent Order.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject Consent Order have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, Florida Administrative Code.

Executed in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff  
District Director  
Southwest District

JMF/sjp

Attachments

Copies furnished to:

Richard Garity, PhD, HCEPC  
Larry Morgan, OGC Tallahassee  
Jeff Greenwell, P.E., FDEP Tampa, Water Facilities  
William Kriash, FDEP Tampa, Waste

Tampa Electric Co  
Mr. Hugh W. Smith, Vice-President

Big Bend Facility, RAP Approval  
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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this **NOTICE OF AGENCY ACTION** and all copies were mailed before the close of business on January 24, 2007 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT  
FILED**, on this date, pursuant to  
Section 120.52(10), Florida Statutes,  
with the designated Department,  
Clerk, receipt of which is hereby  
acknowledged.

Laura Blair      1/24/07  
Clerk                      Date

### **ECAP Groundwater Monitoring Termination Process**

In accordance with Attachment 2 of this RAP, ECAP groundwater monitoring is required. The ECAP groundwater monitoring termination process provides a method or course of action to discontinue future ECAP monitoring requirements contained in this RAP. If ECAP groundwater monitoring analytical results reveals compliance with groundwater or surface water standards or guidance concentrations, then those parameters may be discontinued from future monitoring requirements. TEC has the option to trend analytical results to demonstrate compliance based on the annual monitoring frequency as addressed in the RAP, or TEC may sample more frequently to obtain a sufficient sampling population to demonstrate compliance. When compliance with the parameter's standard or guidance concentrations are recognized, TEC may submit a letter to the Department requesting the discontinuance of further groundwater monitoring in accordance with this section. The Department would have thirty days to respond to TEC's request.

### **Groundwater Quality Exemption Option - Sodium**

F.A.C. Chapter 62-520.500 provides an option to apply for an exemption from a groundwater quality standard if the facility can meet the objectives of the Rule. TEC shall submit an application to the Department for a water quality criteria exemption of the sodium standard listed under Chapter 62-550, F.A.C. within 90 days of the RAP effective date. If approved the facility shall only report the values of sodium and shall not be subject to the limitation as defined in Chapter 62-550.

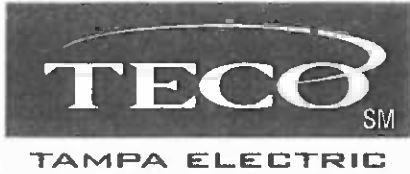
### **Implementation of New Arsenic Standard**

As of January 1, 2005, the groundwater quality standard for arsenic changed from 50 ug/l. to 10 ug/l. TEC shall submit a plan of Study (POS) within six (6) months of the effective date of the RAP identifying the specific technology, operational, or wastewater treatment options that will be implemented and the schedule for its implementation. The facility shall have twenty-four (24) months from the approval of the POS to implement the appropriate technology so the wastewater discharge will be in compliance with the new arsenic standard at the end of this period [24 months].

### **Conclusion/Summary**

The intent of the RAP is to comply with the requirements of the CO and to communicate with the Department TEC's approach for satisfactorily meeting the remedial actions expected by the Department.

In sum, TEC's three remaining remedial action projects include the recycle/settling ponds, new slag de-watering bins that will replace the existing IWW permitted slag pond system, and new gypsum storage area. As addressed in this report, TEC will remove the vast majority of CCP source material from the exiting systems in conjunction with construction of the new/replacement systems. Based on the sampling protocol proposed, and the opportunity to continue groundwater monitoring coupled with the engineering controls (i.e. impervious recycle/settling ponds) TEC believes that this proposal provides reasonable assurance that the environmental assessment and remediation requirements of Order 00-1275 will be met.



Dept. of Environmental Protection

JUL 24 2007

July 24, 2007

Southwest District

Via Hand Delivery

Ms. Iliia Balcom
Florida Department of Environmental Protection
Industrial Wastewater Section
13051 N. Telecom Parkway
Temple Terrace, FL 33637

Re: Tampa Electric Company
Big Bend Power Station
Permit No. FLA017047, OGC Consent Order 00-1275

Dear Ms. Balcom:

Pursuant to requirements specified in the Remedial Action Plan developed in response to OGC Consent Order 00-1275, Tampa Electric Company is submitting this Arsenic Plan of Study (POS) for your review and approval. The POS was developed to address compliance with the groundwater standard for arsenic at the Big Bend site. Three copies of the POS have been provided.

If you need additional information, please contact Terry Eastley at (813) 228-4710.

Sincerely,

Handwritten signature of Stanley M. Kroh

Stanley M. Kroh
Manager, Land and Water Programs
Environmental, Health and Safety

bc: T.L. Eastley (enc)
B.P. Willoughby (enc)
H.C. Harrison, EnHydro, LLC
WP 3.2.4 (enc)
C 2.1

EHS/RLK/TLE125

cc: Samuel Elrabi, EPCHC (enc)

Exhibit "C"



## Jim Beasley

---

**From:** Rusk, Penelope A. <parusk@tecoenergy.com>  
**Sent:** Wednesday, September 14, 2016 4:45 PM  
**To:** Jim Beasley  
**Cc:** Aldazabal, Carlos; Stiles II, Billy J.; Jeff Wahlen  
**Subject:** FW: Revised Big Bend Plan of Study  
**Attachments:** Big Bend CO 00-1275.pdf

**Importance:** High

Jim,

The Consent Order is attached. The email showing FDEP approval of the Big Bend POS is below.

Penelope

---

**From:** Eastley, Terry L.  
**Sent:** Wednesday, September 14, 2016 1:34 PM  
**To:** Rusk, Penelope A. <parusk@tecoenergy.com>  
**Subject:** FW: Revised Big Bend Plan of Study  
**Importance:** High

Penelope,

The email below is FDEP official approval of the Big Bend Plan of Study. We met with them face to face previously and did not have written approval until now. I have also attached the Consent Order.

Regards,

Terry

---

**From:** Kaur, Ramandeep [<mailto:Ramandeep.Kaur@dep.state.fl.us>]  
**Sent:** Wednesday, September 14, 2016 12:19 PM  
**To:** Mike Lodato <[MLodato@Geosyntec.com](mailto:MLodato@Geosyntec.com)>  
**Cc:** Eastley, Terry L. <[tleastley@tecoenergy.com](mailto:tleastley@tecoenergy.com)>; Matt Gozdor <[MGozdor@Geosyntec.com](mailto:MGozdor@Geosyntec.com)>; Boatwright, Kelley M. <[Kelley.M.Boatwright@dep.state.fl.us](mailto:Kelley.M.Boatwright@dep.state.fl.us)>; Morris, John R. <[John.R.Morris@dep.state.fl.us](mailto:John.R.Morris@dep.state.fl.us)>; Morgan, Steve <[Steve.Morgan@dep.state.fl.us](mailto:Steve.Morgan@dep.state.fl.us)>; Evans, Roger <[Roger.Evans@dep.state.fl.us](mailto:Roger.Evans@dep.state.fl.us)>  
**Subject:** RE: Revised Big Bend Plan of Study  
**Importance:** High

**\*\*\*\*\* Don't be quick to click! We're counting on you! This email is from an external sender! Don't click links or open attachments from unknown sources. Forward suspicious emails as an attachment to [phishing@tecoenergy.com](mailto:phishing@tecoenergy.com) for analysis by our cyber security team. \*\*\*\*\***

Hello Mike and Terry,

Exhibit "D"

The Department has completed the review of your revised Plan of Study and it has been approved.

Please let us know if you have any questions/concerns. Thanks for your cooperation!

Sincerely,

*Ramandeep Kaur*

Environmental Manager  
Compliance Assurance Program  
DEP-Southwest District  
Ph: (813) 470-5771

---

**From:** Mike Lodato [mailto:MLodato@Geosyntec.com]  
**Sent:** Thursday, August 18, 2016 10:19 AM  
**To:** Kaur, Ramandeep <Ramandeep.Kaur@dep.state.fl.us>  
**Cc:** Eastley, Terry L. <tleastley@tecoenergy.com>; Matt Gozdor <MGozdor@Geosyntec.com>  
**Subject:** Revised Big Bend Plan of Study

Good morning Ramandeep,

On behalf of the Tampa Electric Company, please find attached the proposed Plan of Study for the Big Bend Power Plant. The POS was revised per our conversation with you yesterday to include sampling of the stormwater runoff from the plant's coal pile.

Please let us know if you have any questions or comments.

Thanks, Mike

**Michael N. Lodato, P.G.**  
**Principal**

**Geosyntec**<sup>®</sup>  
consultants

engineers | scientists | innovators

-----  
13101 Telecom Drive  
Suite 120  
Temple Terrace, Florida 33637  
Office: 813.558.0990  
Direct: 813.379.4388  
Mobile: 813.340.7907  
[www.Geosyntec.com](http://www.Geosyntec.com)

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