



August 26, 2014

Mr. Bobby Bull, PE
Professional Engineer
Siting Coordination Office (SCO)
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Dear Mr. Bull,

As we discussed earlier today, OUC is submitting a request for a modification of our lined ponds system at the Stanton Energy Center (SEC) facility and will submit a petition for modification of the SEC Conditions of Certification no later than the end of next week.

The lined ponds system controls and stores the industrial wastewater generated at the plant which is primarily composed of contact stormwater. OUC is proposing to implement the following construction activities over the next three years: 1) replace and improve the North Coal Runoff pond (NCP), South Coal Runoff pond (SCP), and the Recycle Basin (RB); and 2) construct an additional storage pond, referred to as the Recycle Basin Expansion (RBE), just west of the existing RB. All four of the ponds will be lined with an 80 mil HDPE liner which will be underlain by a 6-inch thick layer of compacted soil sub-base with a maximum saturated hydraulic conductivity of 1.0×10^{-5} cm/sec. OUC intends to complete construction of the RBE and SCP by June, 2015; the NCP by April, 2016; and the RB by May, 2017.

I am attaching the following documents to this cover letter: a) detailed design drawings for the RBE, b) detailed design drawings for the SCP at the 50% completion level, c) *Technical Specifications and Construction Quality Assurance Plan for Recycle Pond Expansion and Existing Lined Ponds Modifications*, and d) *Engineering Report for the Design of Proposed Recycle Pond Expansion and Existing Lined Ponds Modifications*. I will submit the final detailed design drawings for the SCP and a *Construction Dewatering Plan* in the next three weeks as an addendum and follow-up with Post-Certification submittals for the NCP and RB modifications for review by the FDEP once the COC modification has been approved.

The RBE is a 9-acre pond for additional wastewater storage which will be needed to allow the plant to continue operation while the other ponds are upgraded and to provide additional storage capacity for contact stormwater runoff during wet years. The base of the pond will be below the existing grade, surrounded by a perimeter dike, and will be provided with a seepage collection underdrain system along the toe of the pond slope to keep the groundwater elevation beneath the liner system. The drainage from the underdrain system will be routed to the existing 93-acre, unlined, Make-up pond located on the east side of the power plant block.

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The SCP will be converted to a sedimentation control facility to trap and control the large volumes of sediment that flow into the SCP from the stackout pad which is located just east of the existing SCP. The design is analogous to the RBE; however, the pond will be divided into two compartments and will have a reinforced, concrete armored cap. These modifications will allow cleaning operations with heavy equipment without abatement to operations.

Please contact me directly if you have any questions or need any additional information.

Thank you,

A handwritten signature in blue ink, appearing to read 'Charlie Doud', is written over a horizontal line.

Charlie Doud, PE

cdoud@ouc.com

407 719 6055

cc: Richard Tedder, PE, Program Administrator, Solid Waste Section
Tom Lubozynski, PE, FDEP, Central District Waste and Air Program Administrator
Ms. Deb Laisure, PE, FDEP, Stormwater Manager
Garfield Blair, Director, OUC Environmental Division
Nadim F. Fuleihan, PE, Ardaman & Associates, Inc.
Jennifer Deal, TetraTech, Inc.
Mohamad Al-hawaree, PE, Ardaman & Associates, Inc.
Francis K. Cheung, PE, Ardaman & Associates, Inc.