



May 1, 2019

Ms. Ann Seiler
Environmental Consultant
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Ms. Seiler,

I am writing to respond to your March 27, 2019 email concerning the regulatory review of the proposed Cell 2 construction of the coal combustion residual landfill and the associated borrow pit at the Stanton Energy Center (SEC). I met with Mr. Leo Anglero of the Florida Department of Environmental Protection (FDEP) at the Central District Office on April 9, 2019 to discuss the Environmental Resource Permit (ERP) requirements for the proposed Cell 2 construction and associated borrow pit development at SEC. As you are aware, Cell 2 will be constructed immediately north of Cell 1 and is one of three landfill cells, each with a basal area of approximately 30 acres, within the horizontal expansion to the west of the original 90-acre combustion waste storage area (CWSA).

The area designated by OUC for development of an on-site borrow pit and associated west haul road extension to supply fill materials for construction of Cell 2 encompasses approximately 25 acres of land to the north of the closed 90-acre original CWSA and to the northeast of the proposed Cell 2. OUC has planned to retain a contractor to excavate the borrow pit to a depth no greater than 40 feet below land surface and to conduct dewatering during the borrowing operation, i.e., the excavation will be performed in-the-dry. Furthermore, OUC is planning to sort, stockpile, and test the excavated materials so that they will be ready for use during construction of Cell 2. A preliminary engineering report prepared by Ardaman & Associates, Inc. (AA), related to development of the proposed borrow pit titled "Preliminary Engineering Report for Development of a Proposed Borrow Pit at Orlando Utilities Commission Stanton Energy Center", dated February 15, 2019, was submitted to the FDEP Siting Coordination Office (SCO) on February 15, 2019 as one of the attachments in the post-certification amendment request for the construction of Cell 2.

Stormwater runoff for the Cell 2 landfill after closure will be managed by the existing 25-acre wet detention pond located south of the waste disposal area. The wet detention pond was designed to serve the entire 250-acre waste disposal site at the final, buildout condition. Design of the wet detention pond, which occurred in conjunction with design of the previously referenced 90-acre horizontal expansion, was documented in an AA report titled "Hydrologic and Hydraulic Analyses in Support of the Proposed Horizontal Expansion for the Orlando Utilities Commission (OUC) Coal Combustion Waste Landfill Project, Orange County, Florida," dated November 3, 2011. Upon review of the stormwater management design for the entire 250-acre waste disposal area, the FDEP Central District Office issued an ERP Notice of Post Certification Compliance dated January 20, 2012. In our meeting on April 9, 2019, Mr. Anglero indicated that OUC should submit a letter detailing the following information: 1) design, existing, and future watershed areas reporting to the existing wet detention pond; 2) the existing inflows to the pond; and 3) the impacts of the proposed Cell 2 and borrow pit construction, if any, on the approved stormwater management system. Construction impacts to potential wetland areas were also discussed in the meeting; however, since all wetland impacts were previously mitigated in the original SEC site certification, there are no wetland delineation or mitigation requirements for the proposed construction activities.

As indicated above, the existing wet detention pond was designed to handle the 250-acre watershed of the entire waste disposal area at buildout condition. The wet detention pond currently serves the following areas: 1) the closed original CWSA including the associated vertical expansion and 2) the west haul road. Additional areas anticipated to report to the existing wet detention pond are as follows: 1) post-closure flow from the previously permitted landfill Cells 2 and 3; 2) post-closure flow from any additional landfill cells constructed within the entire 250-acre waste disposal area; 3) the east haul road; and 4) the proposed spur road from Pope Street to the existing west haul road. Of course, the borrow pit area will not contribute stormwater runoff inflow to the existing wet detention pond and will actually remove inflow from the original design accounting. To clarify these watershed stormwater runoff inputs, I have tabulated the watershed areas associated with each of the watershed areas shown in Figure 1 below:

Facility Name	Design Watershed (acres)	Existing Watershed (acres)	Percent Design Watershed Area Remaining	Planned Watershed	Design Watershed Area Remaining (acres)	Percent Design Watershed Area Remaining
CWSA Design	250		100%		250	
Original Closed Landfill		90	64%		160	
West Haul Rd		7	61%		153	
East Haul Rd*				6.35	150	60%
Spur Rd Pope St to West Haul Rd				3	147	59%
Post-Closure Landfill Cell 1				30	117	47%
Post-Closure Landfill Cell 2				30	87	35%
Post-Closure Landfill Cell 3				30	57	23%

* The amendment to the site certification for the East Haul Road modification was approved by the FDEP on September 5, 2018 and is presently under construction. The approval letter is attached to this submittal package.



As demonstrated in the above table, the existing 25-acre wet detention pond is more than sufficient to contain the existing and future watershed inflows, even under final buildout condition when the entire 250-acre waste disposal area has been developed and all landfill cells have been closed. In addition, I have also included the Environmental Resource Permit (EPR) application form with the applicable information for the proposed construction.

Based on my meeting with Mr. Anglero of the FDEP Central District Office, OUC respectfully requests approval of the post-certification amendment request for the proposed Cell 2 construction and on-site borrow pit development. Please do not hesitate to contact me if you have any questions or need any additional information.

Thank you,

Charlie Doud, PE
407.719.6055

Enclosures

cc: Mr. Leo Anglero (FDEP Central District Office)
Ms. Cindy Mulkey, FDEP, Program Administrator, Siting Coordination Office
Ms. Ann Seiler, FDEP, Siting Coordination Office
Mr. Garfield Blair, OUC, Director Environmental Affairs
Mr. Mohamad Al-hawaree, PE, Ardaman & Associates, Inc., President
Mr. Francis Cheung, PE, Ardaman & Associates, Inc.
Mr. Jey Mathiyaparanam, PE, Ardaman & Associates, Inc.
Mr. Nestor Aceituno, PE, Ardaman & Associates, Inc.