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Ann Seiler
Environmental Specialist
Florida Department of Environmental Protection
Siting Coordination Office
3900 Commonwealth Blvd. MS 48
Tallahassee, FL 32399

January 2, 2013

Re: TECO Polk Units 2-5 Conversion
Site Certification Application

Dear Ms. Seiler,

The staff of the Environmental Protection Commission of Hillsborough County (EPC) has completed its review of information submitted in support of the transmission lines portion of the TECO Polk Units 2-5 Conversion Site Certification Application referenced above and recommends approval with the following Conditions of Certification:

1. Noise

Pursuant to Chapter 1-10, Rules of the EPC:

Transmission Line Construction Noise

Noise Rule "Exceptions" exempts construction activities occurring between the hours of 7 a.m. and 6 p.m. Monday through Friday, 8 a.m. and 6p.m. Saturday, and 10 a.m. and 6 p.m. Sunday if reasonable precautions are taken to abate the noise from those activities. Reasonable precautions shall include but not be limited to noise abatement measures such as enclosure of the noise source, use of acoustical blankets, and change in work practice. Construction activities occurring at all other times noise shall be subject to the standards in the EPC Noise Rule Chapter 1-10. www.epchc.org

Transmission Line Operation Noise

Noise resulting from the transmission line operation is subject to the provisions of the Noise Rule, including the A-scale and octave band standards.

2. Unconfined Particulate Matter Emissions (Fugitive Dust)

The project construction activities shall incorporate reasonable precautions to control unconfined emissions of particulate matter (dust), including but not limited to the methods, practices and procedures contained in Chapter 62-296.320(4)(c), Florida Administrative Code (F.A.C.).

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a. These provisions are applicable to any activity, including vehicular movement; transportation of materials; construction, land alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

b. Reasonable precautions deemed necessary for this project include, but are not limited to, the following:

- (1) Speed limit of 10 miles per hour or less shall be enforced on vehicles travelling over exposed soils and other un-stabilized materials.
- (2) Curtail operations during high wind conditions
- (3) Application of water or other dust suppressants to control emissions from such activities as land clearing, transportation of materials, grading roads, spreading of excess soils on right-of-ways, and construction and site development activities.
- (4) Application of water or other dust suppressants to unpaved roads, open stock piles, soils spread on right-of-ways, and other similar activities.
- (5) Seeding and mulching access road surfaces

3. Open Burning

Open burning in connection with initial land clearing shall be conducted in accordance with the non-procedural requirements of Chapter 1-4, Rules of the EPC, specifically with the requirements of Section 1-4.09, which pertain both to pile burning or burning by air curtain incinerator for initial land clearing. TECO shall not burn any materials specifically prohibited by Section 1-4.04. TECO shall provide notice to EPC prior to commencing open burning for initial land clearing and shall indicate in the notice how it intends to comply with the provisions of Chapter 1-4. Burning shall not occur if not approved by the EPC or if the Division of Forestry has issued a ban on burning due to air pollution conditions or due to fire safety.

4. Asbestos

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Asbestos 40 CFR, Part 61, Subpart M promulgated by the U.S. EPA - enforced by the Environmental Protection Commission (EPC) within Hillsborough County on behalf of the State of Florida – DEP to regulate asbestos renovation and demolition projects.

a. Where demolition activities occur, asbestos demolition notification is required for all commercial facilities and for demolition projects involving residential structures with more than four dwelling units, residences that have been used as a business in the past, or if the demolition of more than one residential structure is planned.

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b. Any regulated removal of asbestos containing materials from structures to be renovated or demolished requires notification. Notification and the appropriate fee must be submitted to the EPC at least ten working days prior to the regulated renovation or demolition activity.

c. Prior to the start of any demolition or renovation activities, a thorough asbestos inspection must be performed. According to Chapter 469.003, Florida Statute,, asbestos survey inspections must be performed by a licensed asbestos consultant. Phase I Environmental Assessment reports may not be used in lieu of a thorough asbestos survey inspection conducted

by a trained and licensed asbestos consultant. A copy of the asbestos survey report should be maintained on site at all times. For demolition activities, include a copy of the asbestos survey report with the notification and fee.

d. Asbestos containing waste materials must be disposed of per local, state and federal regulations.

5. Wetland impacts

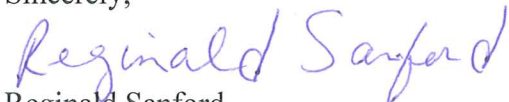
TECO shall provide a copy of the Environmental Resources Permit application to EPC staff in conjunction with their submittal to DEP.

6. Historic Landfills

TECO must ensure that all historic landfills and solid waste filled areas within the boundaries of the project in Hillsborough County are properly managed. During the development/construction planning phases associated with the project, TECO is encouraged to make an appointment with EPC staff to conduct a file review in order to determine the locations of all old landfills. Development or impact to areas filled with solid wastes or areas otherwise impacted by solid waste disposal in Hillsborough County requires the obtainment of a Director's Authorization from the EPC pursuant to Chapter 1-7, Rules of the EPC.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Reginald Sanford
General Manager
Air Division - Enforcement and Analysis