Robert L. McGee, Jr. Regulatory & Pricing Manager One Energy Place Pensacola, Florida 32520-0780

Tel 850.444.6530 Fax 850.444.6026 RLMCGEE@southernco.com



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August 15, 2013

REDACTED

Ms. Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

RE: Docket No.: 110321 - EI

Dear Ms. Cole:

Enclosed are an original and seven copies of Gulf Power Company's Amended Request for Extended Confidential Classification pertaining to portions of the Commission's Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry (PA-10-10-004). Also included is a DVD of Gulf's Amended Request for Confidential Classification and Exhibit C in Microsoft Word format.

Sincerely,

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Enclosures

cc: Beggs and Lane Jeffrey A. Stone, Esq

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry

Docket No.: 110321-EI Date: August 16, 2013

AMENDED REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files an amended request that the Florida Public Service Commission enter an order granting extended confidential classification for certain information produced by Gulf Power and Commission Staff in connection with the Commission's Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry (PA-10-10-004) (the "Review"). As grounds for this request, the Company states:

1. On November 23, 2011, Gulf filed a Request for Confidential Classification of certain information produced by Commission Staff and Gulf Power in connection with the Review. (Document No. 08597-11). The materials that were subject to the initial request were contained in Document No. 08598-11 (collectively the "Confidential Materials").

2. On January 24, 2012, the Commission entered an order granting Gulf Power's request for a period of eighteen (18) months. See Order No. PSC-12-0035-CFO-EI (Document No. 00487-12).

 On July 22, 2013, Gulf filed a Request to Extend Confidential Classification for portions of the Confidential Materials that were subject to Order No. PSC-12-0035-CFO-EI.
(Document No. 04185-13).

4. This amended request is intended to replace Gulf's July 22, 2013, Request to Extend Confidential Classification.

5. Gulf hereby requests that the Commission enter an order extending the confidential classification of certain portions of the Confidential Materials for an additional 18-month period.¹

6. The Confidential Materials identified below remain sensitive and are entitled to continued confidential classification for the same reasons that they were initially classified. As stated in Gulf's original request and as described in detail below, this information constitutes "proprietary confidential business information" as defined by section 366.093(3), Florida Statutes.

Staff's Report

7. Staff's Draft Report summarizes conclusions and recommendations contained in annual Coal Combustion Residue ("CCR") storage and disposal management reports from Southern Company Services' inspections.² These reports present detailed findings regarding the location, makeup and safety of these facilities and recommendations for ensuring the continued safety of such facilities. The reports are the product of Company inspection policies and are in the nature of reports of internal auditors. Consequently, the information included in Staff's Draft Report is confidential pursuant to section 366.093(3)(b), Florida Statutes.

Reponses to Staff Data Requests

8. Commission Staff issued two separate Data Requests to Gulf Power in connection with the Review. In some instances, Gulf provided narrative responses to the data requests. In

¹ In Gulf's original request for Confidential Classification, Gulf sought confidential treatment for information pertaining to quantities of Coal Combustion Residues produced, disposed of, and marketed between 2008 and 2010 along with costs and revenues associated with the same. Due to the passage of time, this information is no longer considered confidential and is therefore not a subject of this Request.

² This same confidential information was also incorporated in Staff's Final Audit Report. The confidential portions of Staff's Final Audit Report were assigned Document Number 00049-12 and were cross-referenced in the Commission's order granting Gulf's original Request for Confidential Classification. Gulf requests that the Commission extend the confidential classification of the confidential information contained in Document Number 00049-12 as well.

other instances, Gulf produced documents in support of its responses. As detailed below, portions of these narrative responses and documents constitute proprietary confidential business information.

Data Request 1 ("DR-1")

9. In response to question 2 of DR-1, Gulf produced copies of various policies and procedures developed by Gulf and the Southern Company for the inspection and management of CCR storage and disposal. The documents are considered proprietary by Gulf Power and represent the Company's best practices for operating its system. Public disclosure of this information will provide Gulf's competitors with access to the Company's internal procedures and the specifications of its facilities. Gulf's competitors could use this information to optimize their own systems at Gulf Power's expense. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

10. In response to question 4 of DR-1, Gulf provided estimates of the remaining capacity in its CCR storage facilities at Plants Crist, Smith, Scholz and Daniel. Information pertaining to the remaining capacity of the CCR facilities is competitively sensitive because it would enable potential purchasers of CCRs to assess the availability to Gulf Power of competing disposal or storage options. That information would allow a potential purchaser to assess demand and adjust the price accordingly, potentially resulting in cost increases. Consequently, this information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

11. In response to question 11 of DR-1, Gulf produced copies of numerous internal reports concerning the CCR storage facilities at Plants Crist, Smith, Scholz and Daniel. These reports present detailed findings regarding the location, makeup and safety of these facilities and recommendations for ensuring the continued safety of such facilities. The reports are the product

of Company inspection policies and are in the nature of reports of internal auditors. Consequently, this information is confidential pursuant to section 366.093(3)(b), Florida Statutes. Additionally, public disclosure of this information could impair the future security of Gulf's CCR facilities. Gulf Power, and other utilities across the nation, have a strong interest in ensuring the security of their facilities, including their CCR facilities. These internal reports provide detailed and specific information regarding the CCR facilities. A potential wrongdoer could take the information provided in Gulf Power's documents, supplement that information with other, publicly available information, and identify points of interest for their efforts.

Data Request 2 ("DR-2")

12. In response to question 1 of DR-2, Gulf provided estimates of the remaining storage capacity in its gypsum storage facilities at Plant Crist. Information pertaining to the remaining capacity of the gypsum storage facilities is competitively sensitive because it would enable potential purchasers of gypsum to assess the availability to Gulf Power of competing disposal or storage options. That information would allow a potential purchaser to assess demand and adjust the price accordingly, potentially resulting in cost increases. Consequently, this information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

13. In response to question 6 of DR-2, Gulf provided copies of its responses to an Environmental Protection Agency ("EPA") information collection request ("ICR"). This response includes: (1) bid proposals from three vendors for a Flue Gas Desulphurization ("FGD") wastewater treatment system; (2) a Functional Design Specification for the FGD wastewater treatment system developed by Infilco Degremont, Inc.; and (3) two reports from Chiyoda Corporation relating to research and development conducted by Chiyoda at the Plant Crist Mercury Research Center. The pricing components of the above-referenced bid proposals

are confidential pursuant to section 366.093(3)(d), Florida Statutes. The above-referenced Functional Design Specification is the intellectual property of Infilco Degremont Inc. and is considered confidential by Infilco Degremont, Inc. Disclosure of this information could result in Infilco Degremont Inc's -- and other contractors-- refusing to do business with Gulf Power in the future or charging higher prices for their services. This information is confidential pursuant to section 366.093(3)(d) and (e). The above-referenced reports developed by Chiyoda Corporation are the intellectual property of Chiyoda Corporation and are considered confidential by Chiyoda Corporation. Chiyoda Corporation devoted significant resources toward development of the conclusions are not publicly known, are of value to Chiyoda Corporation and would be valuable to other market participants. Disclosure of this information could result in Chiyoda Corporation -- and other market participants-- refusing to do business with Gulf Power in the future. This information is confidential pursuant to section 366.093(3)(d) and (e).

14. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

15. Submitted as Exhibit "A" are copies of the subject documents. The information for which confidential classification is requested is highlighted in yellow. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the subject documents, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information for an additional 18-month period.

Respectfully submitted this 15th day of August, 2013.

JEFFREY A. STONE Florida Bar No. 325953 RUSSELL A. BADDERS Florida Bar No. 007455 STEVEN R. GRIFFIN Florida Bar No. 0627569 Beggs & Lane P. O. Box 12950 Pensacola, FL 32591 (850) 432-2451 Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry Docket No.: 110321-EI Date: August 16, 2013

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AMENDED REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk under separate cover as confidential information.

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EXHIBIT "B"

significant change to, existing storage units. Construction of lined landfills, as well as additional waste management and groundwater monitoring may be necessary. Southern Company also stated that under both options, the EPA proposes to exempt the beneficial use of coal combustion byproducts from regulation; however, a hazardous or other designation indicative of heightened risk could limit or eliminate beneficial reuse options. Although its analysis is preliminary, Southern Company believes the EPA has significantly underestimated compliance costs in the proposed rule.

Southern Company stated in its comments that federal oversight is not necessary because its facilities are designed, constructed, and operated according to the best industry practices to ensure CCR management and disposal are safe and effective. However, should the EPA promulgate final regulations, Southern Company urged the EPA to take an approach that recognizes the operational realities of the existing energy delivery structure.

Southern Company further stated that any federal standards or regulations should recognize that CCRs are non-hazardous "solid waste" for purposes of the Resource Conservation and Recovery Act. Gulf believes existing CCR management facilities should be allowed to continue operating and that primary responsibility for CCR regulation should reside with the states, pursuant to the direction provided by Congress under Respurce Conservation and Recovery Act Subtitle D. Among the options proposed or discussed by the EPA, Gulf states proposed by Gulf.

Southern Company stated that the impact of these proposed regulations will depend on their final form and the outcome of any legal challenges. The changes could result in significant additional compliance, operational costs that could affect future unit retirement, replacement decisions, results of operations, cash flows, and financial condition. Also, it noted that higher costs recovered through regulated rates would result in higher rates for customers and could contribute to reduced demand for electricity which could negatively impact results of operations, cash flows, and financial condition.

5.3 PERFORMANCE SELF-EVALUATION

HAS THE UTILITY CONDUCTED ANY STUDIES OR ANALYSES ON ITS COAL COMBUSTION RESIDUAL STORAGE AND DISPOSAL MANAGEMENT PROCESSES?

Annual CCR storage and disposal management reports from Southern Company Services' inspectors conveyed the following over the period 2009 through 2010:

PLANT ERIST The dam safety inspection reports, dated April 9 and December 10, 2010

GULF POWER COMPANY



1234 567

Another internal dam safety inspection report, dated May 19, 2010,

DOES THE UTILITY HAVE PROCESS IMPROVEMENT ACTIVITIES IN PLACE FOR ITS COAL COMBUSTION RESIDUAL STORAGE AND DISPOSAL MANAGEMENT PROCESSES (LESSONS LEARNED, PEER REVIEWS, ETC.)?

Gulf states its weekly inspections, annual safety inspections and assessments of its ash ponds by qualified personnel provide the necessary assurance that the facilities will safely retain the CCRs. Gulf has implemented the following procedures and practices to ensure continued safe CCR operations:

- Emergency response numbers and personnel available twenty-four hours a day, seven days a week if necessary;
- Plant personnel who conduct ash pond inspections are trained by dam safety engineers annually;
- Vegetation on dikes/berms of ash ponds is controlled;
- Any new structures, modifications to existing structures, or changes in maintained sluiced CCR levels must be reviewed and approved by professional engineers at Southern Company Services prior to and during design and construction.

Additionally, Gulf has initiated the stockpiling of gravel and soil at all ash pond locations in the event that corrective actions might be required. Gulf further notes that it strives to improve its best management practices through continual employee education on new industry standards and process improvements.

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landfills. At Plant Scholz, excavated ash from the ash pond is stacked on internal dikes within the ash pond to maintain appropriate and safe volume levels.

At Plant Crist and Plant Daniel, the goals and objectives include reducing the amount of coal ash in the on-site landfills by maximizing the potential beneficial use of coal ash when beneficial use markets are available. To achieve these goals and objectives, Gulf Power continually markets coal ash to concrete and cement companies for their use as raw feed material. This coal ash needs to meet certain parameters to be beneficially used by the concrete and cement companies. Ash that cannot be beneficially used is stored in the on-site coal ash landfills at these plants.

4. Please describe the company's type of disposal facilities and the capacity of each.

RESPONSE: Coal ash is stored at each of the Gull Power facilities described below.

1	Plant Crist Ash Pond -	Area: 16 acres Estimated remaining capacity
2	Plant Crist Ash Landfill -	Area: 68 acres
		Estimated remaining capacity control of 2009
3	Plant Smith Ash Pond -	Area: 172.2 acres
	Plant Smith Ach Lond 51	Estimated remaining capacity grant cy as of 2009
4	Fiant Shifth Ash Landhij-	Area: 72 acres
		Estimated remaining capacity estimated cy as of 2009
5	Plant Scholz Ash Pond –	Area: 31.8 acres
-		Estimated remaining capacity setup cy as of 2009
6	Plant Daniel Ash Pond -	Area: 18.7 acres
		Estimated remaining capacity cy as of 2009
7	Plant Daniel Ash Landfill -	Area: 30 acres
<u>N</u> .		Estimated remaining capacity constrained by as of 2009

5. Please describe the company's current coal ash storage and disposal programs.

RESPONSE: At Plant Crist, fly ash is transported dry via a vacuum/pressure system to two silos. Once in the silos, the ash is either loaded into enclosed trucks for off-site beneficial use by concrete or cement companies or loaded into trucks and taken to the on-site ash landfill for storage/disposal. The bottom ash is transported via water to a hydrobin. The hydrobin is drained each week and the bottom ash is transported by truck to the on-site ash landfill. The ash landfill is divided into cells. Once a cell is full it is capped with top soil and grass.

Coal ash at Plant Smith is transported by a wet sluicing system to the ash pond where the ash is stored. Periodically, it becomes necessary to remove some of the ash from the pond to meet appropriate water detention volume levels. The excavated ash is

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Question 2

Document titled Safety Procedure for Dams and Dikes is confidential in its entirety.

Question 2

Document titled Technical Specification for Ash Stacking (Plant Daniel) is confidential in its entirety.

Question 2

Document titled Plant Crist Dam and Dike Inspection Guidelines is confidential in its entirety.

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Question 2

Document titled Plant Smith Ash Pond Maintenance Plan 2010 is confidential in its entirety.

Question 2

Document titled Fly Ash Disposal and Technical Specifications 2010 (Plant Crist) is confidential in its entirety.

Question 11

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Document titled 2009 Dam Safety Inspection (Scholz) is confidential in its entirety.

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Question 11

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Document titled 2009 Dam Safety Inspection (Crist) is confidential in its entirety.

Question 11

Document titled 2009 Dam Safety Inspection (Smith) is confidential in its entirety.

Question 11

Document titled 2009 Dam Safety Inspection (Daniel) is confidential in its entirety.

Question 11

Document titled 2010 Dam Safety Inspection (Smith) is confidential in its entirety.

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Question 11

Document titled 2010 Dam Safety Inspection (Scholz) is confidential in its entirety.

Question 11

Document titled Ash Pond Evaluation (Smith) is confidential in its entirety.

Question 11

Document titled Hydrologic Analysis Report (Smith) is confidential in its entirety.

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Question 11

Document titled 2010 Dam Safety Inspection (Daniel) is confidential in its entirety.

Question 11

Document titled October 11, 2010 Field Observation (Scholz) is confidential in its entirety.

Question 11

Document titled 2010 Dam Safety Inspection (Crist) is confidential in its entirety.

Question 11

Document titled November 18, 2010 Ash Pond Seepage Cell 1 Seepage Modeling (Scholz) is confidential in its entirety.

Gulf Power Company Responses to Florida Public Service Commission Office of Auditing and Performance Analysis Review of Coal Combustion Residual Storage and Disposal Processes

DOCUMENT REQUEST 2 July 29, 2011

1. In regard to the company's risk assessment efforts concerning its coal combustion residual storage and disposal operations at all surface impoundments and landfills, please identify each impoundment and landfill and corresponding plant and provide:

Response:

1

Plant Crist – coal combustion residual (CCR) surface impoundment and CCR landfill* Plant Smith – CCR surface impoundment and CCR landfill Plant Scholz – CCR surface impoundment Plant Daniel – CCR surface impoundment and CCR landfill

* In a July 15, 2011 e-mail, the Florida Public Service Commission's (PSC) Vic Cordiano noted that the PSC's use of "coal ash" in Document Request 1 (DR-1) should be interpreted as including all types of CCR's. Therefore, to clarify Gulf Power Company's (Gulf Power) responses in DR-1, Questions 4 and 5, Plant Crist has a Flue Gas Desulfurization System (FGD system) which produces synthetic gypsum (FGD gypsum). This system was designed to produce high quality FGD gypsum so the material can be either directed to the drying system where it is subsequently stored in a covered storage area to be marketed for beneficial use or it is sent to the existing FGD gypsum pond/storage area where the water in the FGD gypsum is decanted and the decanted water is then conveyed to another pond to be reused in the FGD system. This results in FGD gypsum remaining in the existing FGD pond/storage area. This FGD gypsum pond/storage area is approximately 16 acres and currently has an estimated available capacity of the formation of the covered storage area.

a. reports, recommendations, and resolutions (including dates) associated with the annual safety inspection and assessment for the past three years;

Response: Each annual safety inspection report identified in Gulf Power's response to Question 11 in DR -1 contains recommendations for that respective year and the status of implementation of any recommendations made for the previous year. The annual safety inspection reports for calendar years 2009 and 2010 for each of Gulf Power's plants were previously provided in response to DR-1 (See Attachment D, Gulf Power Response to DR-1 (February 10, 2011)).

- 3. Please provide follow-up actions concerning all inspection issues that remain open for:
 - a. Plant Crist (April 9 and Dec 10, 2010 inspections);

Response: Please see Gulf Power's response to Question 1.a.

b. Plant Scholz (February 11, 2010 inspection);

Response: Please see Gulf Power's response to Question La.

c. Plant Scholz (October 2 and October 6, 2010 inspections).

Response: The seepage event observed in 2010 at the Plant Scholz CCR surface impoundment did not result in a discharge to waters of the state,

Discovery of the incident and the corrective actions taken by Gulf Power were documented and kept on file in accordance with specific permit conditions in the facility's NPDES permit relating to the CCR surface impoundment. These records (among many others) were available to FDEP representatives during the facility's last NPDES inspection which occurred in February, 2011. Documentation concerning the incident is provided in Attachment D as is the Gulf Power certification letter that mentions the seepage incident and Gulf Power's response thereto.

4. Please complete Exhibits 6A/B for the Daniel and Smith plants.

Response: It is Gulf Power's assumption that Exhibits 6A, 6B, 7A, and 7B attempt to outline/characterize certain of the U.S. Environmental Protection Agency (EPA) requirements proposed in that federal agency's June 21, 2010 rule co-proposals addressing CCRs. Those EPA rule co-proposals are not legally effective and it is unknown at this time when such rules will be finalized by EPA. Nor is it known whether EPA will finalize such rules under Subtitle C (Hazardous Waste) or Subtitle D (Non- Hazardous Waste) of Resource Conservation and Recovery Act (RCRA). Thus, Gulf Power does not believe it is appropriate to use the word "compliance" in any of the Exhibits. Along those lines, Gulf Power respectfully proposes a number of potential changes to those Exhibits. To assist the PSC in better understanding the current environmental regulations applicable to CCR management facilities, Gulf Power provides, in Attachment E, a general outline of the current regulatory framework for CCR landfills and surface impoundments in Florida. Finally, Gulf Power has completed modified Exhibits 6A and 6B for the Daniel and Smith plants as requested. Those modified Exhibits are also found in Attachment E along with modified Exhibits 7A and 7B.

5. What would be the impact (in dollars/month) to ratepayers if the subtitle C, D, or "D-prime" regulations were to be adopted as proposed?

Response: The cost impact of these proposed regulations will depend on their final form and the outcome of any legal challenges and cannot be determined with any certainty at this time.

(Siemens)

1	.0	SCOPE	
		In accordance with your Inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying docum therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices guoted herein. Pricing does not include state sales/use tax.	ients in connection
		"Option" is understood to be Purchaser's option.	
2	٥	PRICING	
~		Note: All pricing F.O.B. plant sile; State sales/use tax is excluded	
	24	Proposal 1 - River water on makeum, discharms to styler	
	art		
		For scepe of supply as described in the Specifications and Vender Proposal	
	2.1.1	Price for providing squipment	\$
	2.1.2	Price for start up assistance	\$
	2,1.3	Price per day for additional field technical support	\$
	2.1.4	Maximum freight to plant sile (All freight to be included here)	\$
	2.1.5	Price for prection of clarifiers (Option)	\$
	2.1.8	Price for low local-shear agitators (Option)	\$
		(where beneficial for process chemistry)	
	2.1.7	Price for acid/caustic neutralization equipment (Option)	\$
	2.2	Proposal 21 – Reclaim water as makeup, discharge to deep wells	2
		For scope of supply as described in the Specifications and Vendor Proposal	
1	2.2.1	Price for providing equipment	\$ 10.000 (million of the second se
2	2.2.2	Price for start up assistance	\$
3	2.2.3	Price per day for additional field technical support	S
4	2.2.4	Maximum freight to plant sile (All freight to be included here)	\$
5	2.2.5	Price for eraction of clarifiers (Option)	\$
6	2.2.5	Price for low local shear agitalors (Option)	
		(where beneficial for process chemistry)	
7	2.2.7	Price for acid/caustic neutralization equipment (Option)	S. S
8	<u>2.2.8</u>	Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option)	<u>\$</u>
9	2.2.9	Price for filter press cloth wash system (Option)	<u>\$</u>
	ITEMS	BELOW INSERTED BY SIEMENS WATER TECHNOLOGIES	
/0	2,2,10	Price for containment during site send blasting operation (Option)	
IJ	2.2.11	Price for filter press acid wash (Option)	<u>s</u>
12	2,2.12	Price for coagulant storage tank (Option)	<u>s</u>
13	2.2.13	Price for hydrochloric acid storage tank & fume scrubber (Option)	S

(Aquatech)

Wastewater Treatment System

1.0 SCOPE In accordance with your Inquiry No. inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying documents in connection therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. "Option" is understood to be Purchaser's option.

2.0 PRICING

Note: All prioing F.O.B. plant site; State sales/use tax is excluded

2.1 Proposal 1 - River water as makeup, discharge to river

For scope of supply as described in the Specifications and Vender Proposal

- 2.1.1 Price for providing equipment
- 2.1.2 Price for start up assistance
- 2-1-3 Price per day for additional field-technical-support
- 2.1.4 Maximum freight to plant site (All freight to be included here)-
- 2.1.5 Price for erection of clarifiers (Option)
- 2.1.6 Price for low local shear agitators (Option) (where beneficial for process chamistry)
- 2.1.7 Price for acid/caustic neutralization equipment (Option)-

2.2 Proposal 21 - Reclaim water as makeup, discharge to deep wells

For scope of supply as described in the Specifications and Vendor Proposal

- 2.2.1 Price for providing equipment
- 2.2.2 Price for start up assistance
- 2.2.3 Price per day for additional field technical support
- 2.2.4 Maximum freight to plant site (All freight to be included here)
- 2.2.5 Price for erection of clarifiers (Option)
- 2.2.6 Price for low local shear agitators (Option) (where beneficial for process chemistry)
- 2.2.7 Price for acid/caustic neutralization equipment (Option)
- 2.2.8 Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option)
- 2.2.9 Price for filter press cloth wash system (Option)



1.0

(Infilco Degremont)

SCOPE In accordance with your inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying documents in connection therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. "Option" is understood to be Purchaser's option.

2.0 PRICING Note: All pricing F.O.B. plant site; State sales/use tax is excluded Proposal 1 - River water as makeup, discharge to river (Alternate Design) 2.1 For scope of supply as described in the Specifications and Vendor Proposal Section Y 1 2.1.1 Frice for providing equipment Z 2.1.2 Price for start up assistance 3 2.1.3 Price per day for additional field technical support 4 2.1.4 Maximum freight to plant site (All freight to be included here) 5 2.1.5 Price for erection of clariflers (Option) 6 2.1.6 Price for low local shear agitators (Option) (where beneficial for process chemistry) 7 \$ 2.1.7 Price for acid/caustic neutralization equipment (Option) Proposal 21 - Reclaim water as makeup, discharge to deep wells (BASE Design) 2.2 For scope of supply as described in the Specifications and Vendor Proposal 8 2.2.1 Price for providing equipment S 9 2.2.2 Price for start up assistance 10 2.2.3 Price per day for additional field technical support 11 2.2.4 Maximum freight to plant site (All freight to be included here) 12 2.2.5 Price for erection of clarifiers (Option) 13 2.2.6 Price for low local shear agitators (Option) (where beneficial for process chemistry)

- 14 2.2.7 Price for acid/caustic neutralization equipment (Option)
- 15 2.2.8 Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option)
- //6 2.2.9 Price for filter press cloth wash system (Option)

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6.0 DESCRIPTIVE DATA AND ENGINEERING INFORMATION

The following descriptive information and design data are furnished in connection with the equipment and materials offered with this Proposal.

6.1 Utility Consumption Data - Plant Crist

Proposal 1

Instrument air (also use for service air)	peak scfm @ psi	averaga scim @ psi	
Potable water	Opeak gpm @ psl	O average gpm Ø psi	
Service water	peak gpm Ø psl	average gpm @ psi	
Electricity	peak kW	average kW/day	

Proposal 2

		1. The Second
peak colm & psi	Avorago celm @ per	
poak gpm @ pei	average gpm & per	
psak gpm @ psi	avorago gpm @-pe	
Scok kW	average kW/day	
	p oak colm & poi p oak opm & poi p oak opm & poi seek kW	peak colm @ pei avorago colm @ pei paak opm @ pei avorago gpm @ pei poak gpm @ pei avorago gpm @ pei poak spin @ pei avorago kW/day

6.2 Chamical Consumption Data - Plant Crist

6.2.1 Chemical Description and Estimated Cost

INNAPPO

Coagulant (as 40% ferric chloride)		
Polymer		
Dewatering Polymer (if needed)	A REAL PROPERTY AND A REAL	
Hydrochloric Acid (37%)	CONTRACTOR OF THE	
TMT		
Lime (hydrated)		
	4	

6.2.2 Chemical Dosing Rate (Estimated)

Proposal 1

Coagulant (as 40% ferric chloride)	75	mg/L		lb/hr	1.35	gal/hr	-
Polymer (Neat Solution 30 % Active)	10	mg/L		lb/hr	0.25	gaVhr	
Dewatering Polymer (If needed)	N/A	mg/L	N/A	lb/hr	N/A	gal/hr	
Hydrochloric Acid (37%)	20	mg/L		lb/hr	0.5	gal/hr	
TMT	4	mg/L		lb/hr	0.26	gal/hr	7
Lime (hydrated)	480	mg/L	47.95	lb/hr		gal/hr	_
		mg/L		lb/hr		gal/hr	-
	1	mg/L	-	lb/hr		gal/hr	
		mg/L		lb/hr		gal/hr	

Question 6

Document titled Functional Design Specification (Infilco Degremont, Inc.) is confidential in its entirety.

Question 6

Documents titled 2008 & 2009 Pilot Test Plant Reports from Chiyoda Corporation are confidential in their entirety.

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s)

Staff's Draft Report

Page 20, lines 1-7 Page 21, lines 1-41 Page 22, lines 1-7

Data Request 1 (Narrative Responses)

Page 2, lines 1-7

Data Request 1 (Documents Produced)

Question 2

Safety Procedure for Dams and Dikes (Confidential in Entirety)

Technical Specification for Ash Stacking (Plant Daniel) (Confidential in Entirety)

Plant Crist Dam and Dike Inspection Guidelines (Confidential in Entirety)

Plant Smith Ash Pond Maintenance Plan 2010 (Confidential in Entirety)

Fly Ash Disposal and Technical Specifications 2010 (Plant Crist) (Confidential in Entirety)

Justification

This information is entitled to confidential classification pursuant to §366.093(3)(b), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 7.

This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 10.

This information is entitled to confidential classification pursuant to \$366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 9.

Question 11

3/10/09 Dam Safety Inspection (Scholz) (Confidential in Entirety)

3/10/09 Dam Safety Inspection (Crist) (Confidential in Entirety)

3/10/09 Dam Safety Inspection (Smith) (Confidential in Entirety)

8/18/09 Dam Safety Inspection (Daniel) (Confidential in Entirety)

3/22/10 Dam Safety Inspection (Smith) (Confidential in Entirety)

3/22/10 Dam Safety Inspection (Scholz) (Confidential in Entirety)

4/23/10 Ash Pond Evaluation (Smith) (Confidential in Entirety)

6/29/10 Hydrologic Analysis Report (Smith) (Confidential in Entirety)

9/16/10 Dam Safety Inspection (Daniel) (Confidential in Entirety)

10/11/10 Field Observations (Scholz) (Confidential in Entirety)

1/24/11 Dam Safety Inspection (Crist) (Confidential in Entirety)

11/18/10 Ash Pond Cell 1 Seepage Modeling (Scholz) (Confidential in Entirety

Data Request 2 (Narrative Responses)

Page 1, line 1 Page 3, lines 1-3 This information is entitled to confidential classification pursuant to §366.093(3)(b), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 11.

This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 12.

Data Request 2 (Documents Produced)

Question 6

Bid Proposal (Siemens) Page 2 of Attachment 1, lines 1-13

Bid Proposal (Aquatech International Corp.) Page 2 of Attachment 1, lines 1-9

Bid Proposal (Infilco Degremont, Inc.) Page 2 of Attachment 1, lines 1-16 Page 4 of Attachment 1, lines 1-6

Functional Design Specification (Infilco Degremont, Inc) (Confidential in its Entirety)

1/2008 and 1/2009 Pilot Test Plant Reports From Chiyoda Corporation (Confidential in their Entirety) This information is entitled to confidential classification pursuant to §366.093(3)(d)-(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 13.

EXHIBIT "B"

significant change to, existing storage units. Construction of lined landfills, as well as additional waste management and groundwater monitoring may be necessary. Southern Company also stated that under both options, the EPA proposes to exempt the beneficial use of coal combustion byproducts from regulation; however, a hazardous or other designation indicative of heightened risk could limit or eliminate beneficial reuse options. Although its analysis is preliminary, Southern Company believes the EPA has significantly underestimated compliance costs in the proposed rule.

Southern Company stated in its comments that federal oversight is not necessary because its facilities are designed, constructed, and operated according to the best industry practices to ensure CCR management and disposal are safe and effective. However, should the EPA promulgate final regulations, Southern Company urged the EPA to take an approach that recognizes the operational realities of the existing energy delivery structure.

Southern Company further stated that any federal standards or regulations should recognize that CCRs are non-hazardous "solid waste" for purposes of the Resource Conservation and Recovery Act. Gulf believes existing CCR management facilities should be allowed to continue operating and that primary responsibility for CCR regulation should reside with the states, pursuant to the direction provided by Congress under Resource Conservation and Recovery Act Subtitle D. Among the options proposed or discussed by the EPA, Gulf states proposed by Gulf.

Southern Company stated that the impact of these proposed regulations will depend on their final form and the outcome of any legal challenges. The changes could result in significant additional compliance, operational costs that could affect future unit retirement, replacement decisions, results of operations, cash flows, and financial condition. Also, it noted that higher costs recovered through regulated rates would result in higher rates for customers and could contribute to reduced demand for electricity which could negatively impact results of operations, cash flows, and financial condition.

53 PERFORMANCE SELF-EVALUATION

HAS THE UTILITY CONDUCTED ANY STUDIES OR ANALYSES ON ITS COAL COMBUSTION RESIDUAL STORAGE AND DISPOSAL MANAGEMENT PROCESSES?

Annual CCR storage and disposal management reports from Southern Company Services' inspectors conveyed the following over the period 2009 through 2010:

PLANT GRIST

The dam safety inspection reports, dated April 9 and December 10, 2010

GULF POWER COMPANY



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Another internal dam safety inspection report, dated May 19, 2010,

DOES THE UTILITY HAVE PROCESS IMPROVEMENT ACTIVITIES IN PLACE FOR ITS COAL COMBUSTION RESIDUAL STORAGE AND DISPOSAL MANAGEMENT PROCESSES (LESSONS LEARNED, PEER REVIEWS, ETC.)?

Gulf states its weekly inspections, annual safety inspections and assessments of its ash ponds by qualified personnel provide the necessary assurance that the facilities will safely retain the CCRs. Gulf has implemented the following procedures and practices to ensure continued safe CCR operations:

- Emergency response numbers and personnel available twenty-four hours a day, seven days a week if necessary;
- Plant personnel who conduct ash pond inspections are trained by dam safety engineers annually;
- Vegetation on dikes/berms of ash ponds is controlled;
- Any new structures, modifications to existing structures, or changes in maintained sluiced CCR levels must be reviewed and approved by professional engineers at Southern Company Services prior to and during design and construction.

Additionally, Gulf has initiated the stockpiling of gravel and soil at all ash pond locations in the event that corrective actions might be required. Gulf further notes that it strives to improve its best management practices through continual employee education on new industry standards and process improvements.

GULF POWER COMPANY

landfills. At Plant Scholz, excavated ash from the ash pond is stacked on internal dikes within the ash pond to maintain appropriate and safe volume levels.

At Plant Crist and Plant Daniel, the goals and objectives include reducing the amount of coal ash in the on-site landfills by maximizing the potential beneficial use of coal ash when beneficial use markets are available. To achieve these goals and objectives, Gulf Power continually markets coal ash to concrete and cement companies for their use as raw feed material. This coal ash needs to meet certain parameters to be beneficially used by the concrete and cement companies. Ash that cannot be beneficially used is stored in the on-site coal ash landfills at these plants.

4. Please describe the company's type of disposal facilities and the capacity of each.

RESPONSE: Coal ash is stored at each of the Gulf Power facilities described below.

1	Plant Crist Ash Pond	Area: 16 acres Estimated remaining capacity
Z	Plant Crist Ash Landfill –	Area: 68 acres Estimated remaining capacity
3	Plant Smith Ash Pond –	Area: 172.2 acres
4	Plant Smith Ash Landfill-	Estimated remaining capacity accord cy as of 2009 Area: 72 acres Estimated remaining capacity accord cy as of 2009
5	Plant Scholz Ash Pond –	Area: 31.8 acres Estimated remaining capacity groups of 2009
6	Plant Daniel Ash Pond -	Area: 18.7 acres
7	Plant Daniel Ash Landfill –	Estimated remaining capacity cy as of 2009 Area: 30 acres
05		Estimated remaining capacity control cy as of 2009

5. Please describe the company's current coal ash storage and disposal programs.

RESPONSE: At Plant Crist, fly ash is transported dry via a vacuum/pressure system to two silos. Once in the silos, the ash is either loaded into enclosed trucks for off-site beneficial use by concrete or cement companies or loaded into trucks and taken to the on-site ash landfill for storage/disposal. The bottom ash is transported via water to a hydrobin. The hydrobin is drained each week and the bottom ash is transported by truck to the on-site ash landfill. The ash landfill is divided into cells. Once a cell is full it is capped with top soil and grass.

Coal ash at Plant Smith is transported by a wet sluicing system to the ash pond where the ash is stored. Periodically, it becomes necessary to remove some of the ash from the pond to meet appropriate water detention volume levels. The excavated ash is

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Question 2

Document titled Safety Procedure for Dams and Dikes is confidential in its entirety.

Question 2

Document titled Technical Specification for Ash Stacking (Plant Daniel) is confidential in its entirety.

Question 2

Document titled Plant Crist Dam and Dike Inspection Guidelines is confidential in its entirety.

Question 2

Document titled Plant Smith Ash Pond Maintenance Plan 2010 is confidential in its entirety.

Question 2

Document titled Fly Ash Disposal and Technical Specifications 2010 (Plant Crist) is confidential in its entirety.

Question 11

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Document titled 2009 Dam Safety Inspection (Scholz) is confidential in its entirety.

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Question 11

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Document titled 2009 Dam Safety Inspection (Crist) is confidential in its entirety.

Question 11

Document titled 2009 Dam Safety Inspection (Smith) is confidential in its entirety.

Question 11

Document titled 2009 Dam Safety Inspection (Daniel) is confidential in its entirety.

Question 11

Document titled 2010 Dam Safety Inspection (Smith) is confidential in its entirety.

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Question 11

Document titled 2010 Dam Safety Inspection (Scholz) is confidential in its entirety.

Question 11

Document titled Ash Pond Evaluation (Smith) is confidential in its entirety.

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Question 11

Document titled Hydrologic Analysis Report (Smith) is confidential in its entirety.

Question 11

Document titled 2010 Dam Safety Inspection (Daniel) is confidential in its entirety.

Question 11

Document titled October 11, 2010 Field Observation (Scholz) is confidential in its entirety.

Question 11

Document titled 2010 Dam Safety Inspection (Crist) is confidential in its entirety.

Question 11

Document titled November 18, 2010 Ash Pond Seepage Cell 1 Seepage Modeling (Scholz) is confidential in its entirety.

Gulf Power Company Responses to Florida Public Service Commission Office of Auditing and Performance Analysis Review of Coal Combustion Residual Storage and Disposal Processes

DOCUMENT REQUEST 2 July 29, 2011

1. In regard to the company's risk assessment efforts concerning its coal combustion residual storage and disposal operations at all surface impoundments and landfills, please identify each impoundment and landfill and corresponding plant and provide:

Response:

1

Plant Crist – coal combustion residual (CCR) surface impoundment and CCR landfill* Plant Smith – CCR surface impoundment and CCR landfill Plant Scholz – CCR surface impoundment Plant Daniel – CCR surface impoundment and CCR landfill

* In a July 15, 2011 c-mail, the Florida Public Service Commission's (PSC) Vic Cordiano noted that the PSC's use of "coal ash" in Document Request 1 (DR-1) should be interpreted as including all types of CCR's. Therefore, to clarify Gulf Power Company's (Gulf Power) responses in DR-1, Questions 4 and 5, Plant Crist has a Flue Gas Desulfurization System (FGD system) which produces synthetic gypsum (FGD gypsum). This system was designed to produce high quality FGD gypsum so the material can be either directed to the drying system where it is subsequently stored in a covered storage area to be marketed for beneficial use or it is sent to the existing FGD gypsum pond/storage area where the water in the FGD gypsum is decanted and the decanted water is then conveyed to another pond to be reused in the FGD system. This results in FGD gypsum remaining in the existing FGD pond/storage area. This FGD gypsum pond/storage area until a possible beneficial use is identified. The existing FGD gypsum pond/storage area is approximately 16 acres and currently has an estimated available capacity of the cubic yards. There is approximately: The cubic yards of storage capacity in the covered storage area.

a. reports, recommendations, and resolutions (including dates) associated with the annual safety inspection and assessment for the past three years;

Response: Each annual safety inspection report identified in Gulf Power's response to Question 11 in DR -1 contains recommendations for that respective year and the status of implementation of any recommendations made for the previous year. The annual safety inspection reports for calendar years 2009 and 2010 for each of Gulf Power's plants were previously provided in response to DR-1 (See Attachment D, Gulf Power Response to DR-1 (February 10, 2011)).

- 3. Please provide follow-up actions concerning all inspection issues that remain open for:
 - a. Plant Crist (April 9 and Dec 10, 2010 inspections);

Response: Please see Gulf Power's response to Question 1.a.

b. Plant Scholz (February 11, 2010 inspection);

Response: Please see Gulf Power's response to Question La.

c. Plant Scholz (October 2 and October 6, 2010 inspections).

Response: The seepage event observed in 2010 at the Plant Scholz CCR surface impoundment did not result in a discharge to waters of the state.

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Discovery of the incident and the corrective actions taken by Gulf Power were documented and kept on file in accordance with specific permit conditions in the facility's NPDES permit relating to the CCR surface impoundment. These records (among many others) were available to FDEP representatives during the facility's last NPDES inspection which occurred in February, 2011. Documentation concerning the incident is provided in Attachment D as is the Gulf Power certification letter that mentions the seepage incident and Gulf Power's response thereto.

4. Please complete Exhibits 6A/B for the Daniel and Smith plants.

Response: It is Gulf Power's assumption that Exhibits 6A, 6B, 7A, and 7B attempt to outline/characterize certain of the U.S. Environmental Protection Agency (EPA) requirements proposed in that federal agency's June 21, 2010 rule co-proposals addressing CCRs. Those EPA rule co-proposals are not legally effective and it is unknown at this time when such rules will be finalized by EPA. Nor is it known whether EPA will finalize such rules under Subtitle C (Hazardous Waste) or Subtitle D (Non- Hazardous Waste) of Resource Conservation and Recovery Act (RCRA). Thus, Gulf Power does not believe it is appropriate to use the word "compliance" in any of the Exhibits. Along those lines, Gulf Power respectfully proposes a number of potential changes to those Exhibits. To assist the PSC in better understanding the current environmental regulations applicable to CCR management facilities, Gulf Power provides, in Attachment E, a general outline of the current regulatory framework for CCR landfills and surface impoundments in Florida. Finally, Gulf Power has completed modified Exhibits 6A and 6B for the Daniel and Smith plants as requested. Those modified Exhibits are also found in Attachment E along with modified Exhibits 7A and 7B.

5. What would be the impact (in dollars/month) to ratepayers if the subtitle C, D, or "D-prime" regulations were to be adopted as proposed?

Response: The cost impact of these proposed regulations will depend on their final form and the outcome of any legal challenges and cannot be determined with any certainty at this time.

Wastewater Treatment System

13

(Siemens)

1.0)	SCOPE				
		In accordance with your Inquiry No. Inviting proposals for Waste	water Treatment			
		system for the referenced generating plant and subject to all condit	lons and			
		requirements of your Specification, all related attachments and acc	ompanying documents in	connection		
		therewith, we propose to design, fabricate, deliver, and commission	the equipment			
		for the prices quoted herain. Prizing does not include state sales/u	se tax.			
		"Option" is understood to be Purchaser's option.				
20	20					
2.0)	PRICING				
		Note: All pricing F.O.B. plant site; State sales/use tax is exclusion	ded			
	14112					
	2,1	Proposal 1 - River water as makeup, discharge to river				
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		Por coope of suppry as appended in the opennedents and ventue.	e. inhreas.			
	211	Price for providing equipment		\$		
	L.117	the second statements				
	21.2	Price for start up assistance		\$		
	2.1.3	Price per day for additional field (schnical-support		\$		
		N 101 10				
	2.1.4	Maximum freight to plant site (Al freight to be included here)-		\$		
	2.1.5	Price for oraction of clarifiers (Option)		\$		
	20172				•	
	2,1,8	Price for low local shear agrictors (Option)		*		
		(where beneficial for procase chamitiny)				
	217	Price for said/caustic neutralization aquinment (Ontion)		\$		
		Line in annound ann ann ann ann adrikmant Cakanty				
	22	Proposal 21 - Reclaim water as makeup, discharge to deep we	lis			
		For scope of supply as described in the Specifications and Vendor	Proposal			
				The second in		
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_		Sector av international				
2	2.2.2	Price for start up assistance		•	in merina 🗄	田学校のあると
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>	2.2.3	Price per day for additional field technical support		A	$1 = 1 + 5 - \Lambda + c^2 = 1 = c_A = -2 - 5$	
J	224	Maximum freight to plant site (All freight to be included here)		s		
7	2.2.4	madinum neight to plant site our neight to be moladed neito)			Contraction of the second	
5	225	Price for erection of clarifiers (Ootion)		\$	5	
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6	2.2.6	Price for low local shear agitators (Option)		語彙報	教	
		(where beneficial for process chemistry)				
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1	2.2.7	Price for add/caustic neutralization equipment (Option)		25	and a second	
		u sa man a sum Anu		Ac		
8	2.2.8	Price for items which increase filter press automation, minimize		32E		
		maintenance, or alert DCS operators there is trouble with the				
		presses (Oppon)				
9	229	Price for filler oress cloth wash system (Option)		\$	Stainter -	
1	Are Rev O		1			
	ITEMS	BELOW INSERTED BY SIEMENS WATER TECHNOLOGIES				
					and the second second	
10	2,2,10	Price for containment during site sand blasting operation (Option).		<u>§</u>	也理论方明	
					5000	
U	2,2.11	Price for filter press acid wash (Option)		3 4	NA.N.	
10		Odes for several last stores to the (Outloo)	· * **		電話	
12	2,2.12	Price for coaquiant storage tank (Option)		2	and the second	
	2240	Pice for hydrochloric sold storage tank & fume scrubber (Option)		S f	All States	
14	F. 6, 10	The of the production and and and and take a faile of appendiction				

(Aquatech)

Wastewater Treatment System

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1.0	SCOPE In accordance with your Inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying door therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. "Option" is understood to be Purchaser's option.	nt ument s t	in connection
2.0	PRICING <u>Note:</u> All priving F.O.B. plant site; State sales/use tax is excluded		
2.1	Proposal 1 — River water as makeup, discharge to river		
	For scope of supply as described in the Specifications and Vender Proposal		
2.1.1	Prize for providing equipment	\$_	
2.1.2	Price for elart up assistance	\$	
2.1.3	Price per day for additional field technical support	\$_	
2.1.4	Maximum freight to plant site (All freight to be included here)-	\$	
2.1.5	Price for areation of clarifiers (Option)	· *_	
2.1.6	Price for low local shear agilators (Option) (where beneficial for process chamistry)	\$_	
2,1,7	Price for acid/caustic neutralization equipment (Option)	\$_	
2.2	Proposal 31 – Reolaim water as makeup, discharge to deep wells		
	For scope of supply as described in the Specifications and Vendor Proposal		
2.2.1	Price for providing equipment	\$	Real Provide P
2.2.2	Price for start up assistance	\$	
2.2.3	Price per day for additional field technical support	\$	and the states
2.2.4	Maximum freight to plant site (All freight to be included here)	5_	金
2.2.5	Price for erection of clatifiers (Option)	s	F
2.2.6	Price for low local shear agitators (Option) (where beneficial for process chemistry)	\$	
2.2.7	Price for acid/caustic neutralization equipment (Option)	\$	Acres Stre
2.2.8	Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option)	ş	International States
2.2.9	Price for filter press cloth wash system (Option)	<u>\$</u>	ale 19930

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(Infilco Degremont)

SCOPE In accordance with your inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying documents in connection therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. "Option" is understood to be Purchaser's option.

2.0 PRICING Note: All pricing F.O.B. plant elte; State sales/use tax la excluded Proposal 1 - River water as makeup, discharge to river (Alternate Design) 2.1 For scope of supply as described in the Specifications and Vendor Proposal ALC: N 1 建香 2.1.1 Price for providing equipment Z 2,1.2 Price for start up assistance 3 2.1.3 Price per day for additional field technical support 4 構成にい 2.1.4 Maximum freight to plant site (All freight to be included here) 國際的政治法 5 2,1.5 Price for erection of clariflers (Option) Hain 6 2.1.6 Price for low local shear agitators (Option) (whare beneficial for process chemistry) た 7 刻\$\$ 2.1.7 Price for acid/caustic neutralization equipment (Option) Proposal 21 - Reclaim water as makeup, discharge to deep wells (BASE Design) 2.2 For scope of supply as described in the Specifications and Vendor Proposal 8 100-5 2.2.1 Price for providing equipment 9 2.2.2 Price for start up assistance 2.2.3 Price per day for additional field technical support 10 2,2,4 Maximum freight to plant site (All freight to be included here) 11 12 2.2.5 Price for erection of clarifiers (Option) 13 2.2.6 Price for low local shear agitators (Option) (where beneficial for process chemistry) 14 2.2.7 Price for acid/caustic neutralization equipment (Option) S.S.S.R. 15 2.2.8 Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option) Res a 2. 2.2.9 Price for filter press cloth wash system (Option) 16

6.0 DESCRIPTIVE DATA AND ENGINEERING INFORMATION

The following descriptive information and design data are furnished in connection with the equipment and materials offered with this Proposal.

8.1 Utility Consumption Data - Plant Crist

Proposal 1

FIUDUSALI			
Instrument air (also use for service air)	peak sofm @ psi	average soim @ psi	
Potable water	Opeak gpm @ psl	O average gpm O psi	
Service water	peak gpm @ psl	average gpm @ psi	
Electricity	peak kW	average kW/dey	

Proposal 2

Htoposat 2			
Instrument air (also use for service air)	peak colm @-psi	avorago colm @ aci	
Pojabie water	boak opm C pei	avorago gpm & per	
Service water	peak gpm @ pei	average gpm @ ps	
Electricity	SCOK KW	average kW/day	

6.2 Chemical Consumption Dats - Plant Crist

6.2.1 Chemical Description and Estimated Cost

-NAAPP?

Coagulant (as 40% ferric chloride)		
Polymer	and the second second	
Dewatering Polymer (if needed)		
Hydrochloric Acid (37%)		
TMT		
Lime (hydrated)		
a contra de la contr		
·		

6.2.2 Chemical Dosing Rate (Estimated)

Proposal 1

Coagulant (as 40% ferric chloride)	75	ma/L		lb/hr	1.35	gal/hr
Polymer (Neat Solution 30 % Active)	10	mol		lb/hr	0.25	gaVhr
Dewatering Polymer (If needed)	N/A	ma/L	N/A	lb/hr	N/A	gal/hr
Hydrochloric Acid (37%)	20	ma/L		lb/hr	0.5	gal/hr
TMT	4	ma/L		lb/hr	0.26	gal/hr
Lime (hydrated)	480	mgA	47.95	lb/hr		gal/hr
		ImaA		lib/hr		gal/hr
		mod		lb/hr		gal/hr
		Ima/L		lb/hr		gal/hr

Question 6

Document titled Functional Design Specification (Infilco Degremont, Inc.) is confidential in its entirety.

Question 6

Documents titled 2008 & 2009 Pilot Test Plant Reports from Chiyoda Corporation are confidential in their entirety.