AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

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August 1, 2012

HAND DELIVERED

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

> Petition for approval of new environmental program for cost recovery through Re: Environmental Cost Recovery Clause by Tampa Electric Company; Docket No. 110262-EI

Dear Ms. Cole:

Enclosed is one copy of Tampa Electric Company's response to Staff's Fourth Data Request dated July 3, 2012.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Enclosure

cc: Charles Murphy (w/enc.)

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TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 1 PAGE 1 OF 2 FILED: AUGUST 01, 2012

For purposes of the following requests, please refer to the Interim Report – Gypsum Disposal filed with the Commission on June 25, 2012.

- Referring to Paragraph 1, does construction of the new gypsum storage facility still represent "Tampa Electric Company's considered best judgment?" Please explain why or why not.
- A. Yes. Tampa Electric still considers the construction of an additional storage facility to be the best option for the long term management of gypsum inventory. Several factors have changed since the filing of this docket in August 2011; however, the company's philosophy regarding by-product disposition has not changed. Tampa Electric remains focused on beneficial re-use of by-product materials as it remains the most costeffective approach for its customers. It has the added benefit of being the most environmentally responsible placement of gypsum by-product.

In the time since this docket was filed, the company's production of gypsum has been close to the level expected. Additionally, the consumption of gypsum from the company's primary off-taker, National Gypsum, has been less than expected, and as a result, the gypsum inventory has grown more rapidly than forecasted. Due to the increase in inventory, and under certain meteorological conditions, Tampa Electric has received complaints from residents living near the gypsum pile regarding nuisance dusting. The residents have complained about gypsum dusting problems, which are caused by winds interacting with the larger volumes of gypsum and the taller height of the gypsum storage pile. In response to these concerns, the company elected to landfill some material in order to make space for continued operation and to reduce the pile height for the dusting concerns. Landfilling the lesser quality gypsum currently stored on site will allow the pile height to be cut in half and maintaining this level will result in a reduced storage capacity to 870,000 tons. Tampa Electric has been able to negotiate a reduced disposal cost with two landfills, based on their need for "valley fill" material, that has somewhat mitigated the expense of this action. "Valley fill" is a landfill term used to describe the use of a smaller particle fill material (in this case, gypsum) to fill in the spaces between larger landfill disposal items to make the landfill surface smoother and more stable.

In order to continue to use the existing storage area and meet the current standards for ground water and surface water protection, a liner must be installed below the area by April 2015. This will require the gypsum from the existing storage area to be removed to allow for liner installation. The addition of a second storage area will allow this to be accomplished in a manner that minimizes the need to landfill material and allows the existing storage area to continue to be used. Having two storage locations will allow the company to focus the primary handling and storage activities at the new site. The

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TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 1 PAGE 2 OF 2 FILED: AUGUST 1, 2012

existing site would be used for longer term storage which will minimize the potential for fugitive dust emissions affecting residents living near the existing site.

Since 1999, the company has sold over 7.3 million tons of gypsum (approximately \$31.6 million) to its primary off-taker, National Gypsum, pursuant to a contract with that firm. Prospectively, the company continues to aggressively pursue cost-effective options for the beneficial re-use of its by-product gypsum. In the short term, the opportunities in Florida are relatively limited but all options are being pursued. The greater opportunity appears to be for international use and the company is negotiating with several potential international off-takers.



re-use.

In light of these facts, Tampa Electric's expectations are that gypsum production will continue to exceed the cumulative demand for beneficial re-use for the next several years. The company also expects demand for gypsum to eventually recover as the Florida construction market improves and international markets are more fully developed. These conditions indicate that having additional working storage at the Big Bend site is prudent and appropriate if the additional storage facility can be built in a cost-effective manner. Even in the event that gypsum demand does not recover sufficiently to match production, the additional area can store approximately 870,000 tons and will avoid the expense of landfilling that amount of gypsum.

Tampa Electric recognizes, and shares, the Commission's concerns over the cost of the proposed gypsum storage facility. The company has looked for options to reduce the overall expense of this project and has identified several cost reduction items that can be incorporated. While the reduced scope presents traffic safety, environmental and product quality challenges, it is a functional and prudent approach and in Tampa Electric's best judgment, a viable solution to the gypsum issue. These scope reductions are discussed more fully in the company's response to No. 2(c) of this data request.

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 2 PAGE 1 OF 11 FILED: AUGUST 1, 2012

- 2. Referring to Paragraph 3:
 - a. Please clarify what is meant by "commercially viable and compliant alternatives." Without revealing confidential information, please describe what factors would be evaluated in making these determinations.
 - b. Has TECO identified new potential gypsum off-takers in Latin America? If so, are any negotiations underway?
 - c. Please describe the options that are being considered for reducing the cost of the gypsum storage facility.
- A. a. Prior to entering into contractual arrangements to buy or sell any product or service, Tampa Electric evaluates potential counterparties to ensure that they meet appropriate legal, financial, and environmental requirements. Specific terms and conditions addressed in the Request for Interest Tampa Electric sent to potential additional off-takers of gypsum by-product are outlined below.

Commercially Viable:

Economic Viability – All proposals for the sale of gypsum must, at a minimum, have a good potential to provide a larger economic benefit to Tampa Electric's customers than landfilling the material. This will be driven by the price per ton offered for the product plus any other costs that the proposal does not include and thus which must be covered by Tampa Electric. These costs may include loading of the gypsum into trucks, trucking gypsum to alternative delivery points, additional expense from the use of Tampa Electric's existing infrastructure and resources, etc.

Point of Delivery and Transportation – Proposals that specify "free on board" or FOB into a vessel such as a ship or a barge must specify ships or barges that are compliant with the Big Bend Station dock specifications. These specifications include items such as draft of the vessel when loaded, length and beam of vessel, etc. In addition, since the Big Bend Station dock has only one berth, delivery dates must be coordinated with existing vessel traffic for coal deliveries.



TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 2 PAGE 2 OF 11 FILED: AUGUST 1, 2012



In the current competitive and constrained market,

This could also compromise National Gypsum's ability to continue operating the facility, which would seriously jeopardize the company's ability to dispose of gypsum by-product. Given the volume of gypsum sold to National Gypsum since 1999, the company believes that honoring its deal with National Gypsum is important.

Liquidated Damages – As requested by the Commission, a Request for Interest for gypsum was sent to identify potential firm sales of gypsum. These sales would mitigate potential landfill of gypsum only if the quantities are taken in the agreed time period. Therefore, if the potential customer does not fulfill its obligations for acquiring an annual commitment of specific quantities of gypsum. the liquidated damages are set equal to the cost of landfilling the material not received by the customer. Tampa Electric did receive responses from three potential off-takers of gypsum from its Request for Interest. The company is currently in negotiations with one of the off-takers for the full 50,000 tons they offered on an annual renewal basis. The two other offers were carefully evaluated and determined to be non-viable. One key reason for this determination was that both of these potential off-takers would not accept a secondary position. Additionally, both offers were from wallboard manufacturers who are direct competitors of National Gypsum. Sales to these off-takers would jeopardize the company's business relationship with National Gypsum that has benefitted Tampa Electric customers and the company for the last 20 years. The letters of interest Tampa Electric received are attached to this response.

Compliant Alternatives:

As referenced in Staff's Third Data Request, No. 1(b), gypsum storage areas must comply with environmental laws and regulations. Additionally, gypsum sold to perspective customers must be managed and used in accordance with the appropriate laws and regulations. Proper handling and storage requirements as

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 2 PAGE 3 OF 11 FILED: AUGUST 01, 2012

well as product uses will need to be evaluated to ensure that the current proposals are compliant with federal, state and local laws or regulations.

b. Tampa Electric is currently working toward a tentative agreement with representatives of a potential off-taker in the South American market regarding the long term purchase of gypsum. It is the off-taker's desire to have exclusive rights to all sales in South America in return for a long-term agreement. Purchases of gypsum would start as low as 88,000 tons in 2013 and increase to 165,000 tons by 2014 annually through 2020.

As with other potential off-takers, Tampa Electric is evaluating this entity's proposal with the same methodology as described in Data Request, No. 2 (a), above. Tampa Electric is developing a draft contractual arrangement that will be presented to the potential customer within the next week.

c. As mentioned in the response to Data Request No.1 above, the company will be modifying its petition to reduce the cost of the proposed gypsum storage facility. This new option involves reducing the scope of the project where possible and prudent, and continuing to look for innovative approaches to execute the project at a reduced cost.

The company has determined that the floodplain compensation requirement initially included as part of the project is no longer required and has excluded that portion from the overall project cost. This portion of the project costs represents \$4.5 million.

The originally proposed project also provided for covered storage of a portion of the gypsum to ensure that the specification for moisture content of the material could be met at all times. The company proposes to remove this item and its associated infrastructure from the project scope. The moisture content of the material may be controlled to some extent by pile management techniques; however, there will be an increased risk that off-takers will reject gypsum with moisture above specification.

In addition, the original petition included a conveyor system to transport gypsum from the point of production in the plant to the new storage facility. This pipe conveyor is a superior environmental approach since it has no intermediate transfer points and totally encloses the gypsum during conveyance so there are almost no chances for fugitive dust emissions. The conveyor system is also designed to cross over public roads to eliminate the safety concerns with heavy truck traffic transporting gypsum. In consideration of the need to reduce the cost of this project, the company determined that the best alternative was to eliminate

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 2 PAGE 4 OF 11 FILED: AUGUST 01, 2012

the conveyor system and its associated infrastructure and provide for truck transportation of the gypsum.

Accordingly, Tampa Electric requested Sargent & Lundy ("S&L") to review the scope of the original project proposal and provide an estimate of the reduced scope option excluding the conveyor and other items described above in an effort to reduce the costs. A breakdown of the cost reduction for the various components under the new proposal is attached to this data request response. Using the updated cost estimate for the reduced scope option, the company has determined that the NPVRR of the revised scope is less than the original option over the life of the project; however, the aforementioned environmental benefits would not be available by using the reduced scope trucking option. Tampa Electric will have to implement administrative controls to mitigate the potential for dust emissions and safety concerns with truck traffic across public roads. The updated NPVRR analysis comparing the original scope option and the reduced scope option is also attached to this data request response.

Finally, the facility's lined storage area will have a layer of material installed above the liner to protect it from damage by the mobile equipment working on the pile. This protective layer typically consists of sand or similar material without large particles or sharp objects that could damage the plastic liner material. The Tampa Electric project team has determined that gypsum by-product material is suitable for use as the protective layer and can be approved for this use under environmental permitting regulations. This approach will reduce the cost of the project since protective fill will not need to be purchased. Even more significant is that by using up to 200,000 tons of gypsum material (from the exiting storage site) as a protective layer for the new facility; it will eliminate the need to potentially landfill this amount of gypsum to make additional room for current excess production.

By modifying the original scope of the project and excluding the costs described above, the reduced scope option becomes the cost-effective selection for gypsum by-product management. The total capital cost of the project is now \$21.7 million, which represents a \$33.3 million reduction from the initial petition. Including the associated O&M required as part of the reduced scope option, the total NPVRR of the proposed project amounts to \$33.2 million and represents a \$0.10 gross impact on customer bills before any reduction for existing ECRC projects. While still a significant project, it allows the company to continue the beneficial re-use of gypsum in an environmentally prudent manner as well as providing an additional 870,000 tons of storage.

TAMPA ELECTRIC COMPANY'S RESPONSES TO STAFF'S FOURTH DATA REQUEST REQUEST NO. 2, BATES STAMPED PAGES 7 THROUGH 11 ARE REDACTED

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Capital Cost Breakdown

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Major Activity	Storage Area Original Scope	Storage Area Reduced Scope
Construction Activities	\$11,229,900	\$5,397,700
Engineering	\$3,583,000	\$3,701,600
Major Equipment	\$17,173,900	\$2,157,700
Floodplain Compensation, New Road Access & Wetlands Mitigation	\$5,442,500	\$1,108,200
Project Construction Management	\$4,347,500	\$2,637,250
Silo & Stackout	\$2,300,000	\$1,000,000
Storage Area Liner	\$2,756,700	\$2,726,300
Contingency	\$8,143,200	\$3,014,250
Total	\$54,976,700	\$21,743,000

Tampa Electric Company		
Gypsum Options NPV		

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(in Dollars)

	Storage Area	Storage Area
Year	Original Scope	Reduced Scope
2012	\$0	\$6,508,465
2013	\$0	(\$2,815,118)
2014	\$0	\$3,920,069
2015	\$7,202,564	\$2,866,791
2016	\$6,907,007	\$2,237,024
2017	\$6,629,594	\$1,889,898
2018	\$6,423,197	\$1,718,231
2019	\$6,167,739	\$1,544,485
2020	\$5,907,519	\$1,369,136
2021	\$5,622,709	\$2,233,317
2022	\$5,375,684	\$2,079,343
2023	\$5,137,701	\$1,916,519
2024	\$4,871,564	\$1,772,092
2025	\$4,622,596	\$1,613,652
2026	\$4,371,872	\$1,454,677
2027	\$4,124,195	\$1,292,409
2028	\$3,857,281	\$1,141,302
2029	\$3,604,117	\$6,456,910
2030	\$3,348,392	\$10,006,681
2031	\$3,101,983	\$9,860,447
2032	\$2,828,797	\$10,139,536
2033	\$2,566,642	\$10,209,470
2034	\$2,306,609	\$10,223,492
2035	\$2,247,471	\$6,775,640
2036	\$2,494,758	(\$629,056)
2037	\$2,246,645	(\$809,102)
2038	\$2,506,019	(\$955,770)
2039	\$2,567,418	(\$1,117,429)
2040	\$2,300,681	(\$1,303,125)
2041	\$2,490,669	(\$1,458,958)
2042	\$2,566,814	(\$1,624,239)
2043	\$2,344,327	(\$1,811,561)
2044	\$2,118,774	(\$1,216,874)
2045	\$1,898,055	\$465,129
2046	\$1,674,931	\$333,334
2047	\$1,449,950	\$198,131
2048	\$1,222,713	\$56,456
2049	\$1,000,124	(\$72,091)
NPV	\$61.301.204	\$33.183.922

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 3 PAGE 1 OF 2 FILED: AUGUST 1, 2012

- **3.** Referring to Paragraph 4:
 - a. How many tons of gypsum are currently stored at the existing facility?
 - b. Based on TECO's estimate of National Gypsum's consumption rate, what is the estimated exhaust date of the existing facility, absent any other actions?
 - c. By way of clarification, is it TECO's belief that National Gypsum's consumption rate will not meet its annual minimum quantity in each of the years 2012 through 2016, but returning to normal levels in 2017? If no, please clarify.
 - d. Does "dusting" refer to gypsum being blown off-site to residents? If not, please clarify.
 - e. If "dusting" continues, is there a risk that TECO may violate any environmental standards or requirements? If so, please describe such potential risks.
- A. a. As of June 30, 2012, Tampa Electric's estimated inventory of total gypsum stored is 969,082 tons. This stored gypsum consists of 606,431 tons of higher quality material that is salable to all established markets, 54,623 tons of intermediate quality material that is not suitable for wallboard use because of higher chloride content and lower purity, as well as 348,929 tons of less marketable filter press material and its underburden base that the company is currently providing to landfill for valley fill applications.
 - b. National Gypsum has trucked approximately 31,000 tons of gypsum per month in May and June of this year; however, National Gypsum has only consumed approximately 21,000 tons of gypsum per month to make wallboard.

At its Tampa and Apollo Beach plants. These temporary storage sites have limited storage capacity which may be full by the end of the year.

Tampa Electric has determined that its existing facility has reached and exceeded its capacity due to dusting issues created under certain meteorological conditions given the current height of the gypsum stacks. The company has also received complaints from residents living near the gypsum pile regarding gypsum dusting problems caused by winds interacting with the larger volumes of gypsum and the taller height of the storage pile. In response to these concerns, the company has elected to landfill some material to make space for continued operation and to reduce the pile height and dusting concerns. Landfilling this

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 3 PAGE 2 OF 2 FILED: AUGUST 1, 2012

gypsum will allow the company to reconfigure the existing pile and reduce the pile height almost in half. This will result in less dust emissions from the pile but will reduce the existing gypsum storage capacity to approximately 870,000 tons.

c. The estimates of gypsum consumption Tampa Electric used in preparing this response were provided by National Gypsum in December 2011. Tampa Electric expects that National Gypsum may revise their projections downward for 2013 and beyond due to the Tampa Bay area's depressed housing construction market.

These tons will be used in the future and may further slow National Gypsum's future take of gypsum.

- d. Yes, the term dusting refers to gypsum that is blown off the piles due to certain meteorological conditions such as high wind events.
- e. Yes. There is a potential risk that Tampa Electric may exceed environmental standards or requirements during certain meteorological conditions where unconfined particulate matter emissions could exceed the standard. However, to date there is no specific evidence to indicate that this has occurred. Tampa Electric implements best operating practices such as wetting the pile and plant roads to minimize dust emissions.

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 4 PAGE 1 OF 5 FILED: AUGUST 01, 2012

- 4. Referring to Paragraph 5:
 - a. Where is the landfill located?
 - b. Please identify when TECO determined that it had 350,000 tons of "lesser quality" gypsum, and that this gypsum could not be sold to manufacturers or for agricultural uses.
 - c. Will the total disposal cost be 9,100,000? (350,000 x \$26/ton)
 - d. Is the landfill disposal of the 350,000 tons a one-time event? If not, please clarify the terms of the arrangements with the landfill operator, the duration of the agreement, and by when TECO anticipates finalizing an agreement with the landfill operator.
 - e. Once an agreement is reached, approximately how long will it take to remove the 350,000 tons of lesser quality gypsum from the existing storage site?
 - f. Based on TECO's estimate of National Gypsum's reduced consumption rate and the landfill disposal of the 350,000 tons of lesser quality gypsum, what is TECO's estimated exhaust date of the existing facility?
 - g. Please provide copies of correspondence between TECO and the Environmental Protection Commission of Hillsborough County regarding the Company's mid-term fugitive dust emissions remediation plan. Is this plan satisfactory to the County?
- A. a. Tampa Electric has managed to negotiate the removal of the lower quality gypsum for use in valley fill applications at two separate landfills, Republic Services Inc./Cedar Trails and Omni Waste Services. Republic Services Inc./Cedar Trails is located in Bartow, Florida, 45 miles from Big Bend Station. Omni Waste Services/ Oak Hammock is located in St. Cloud, Florida, 117 miles from Big Bend Station.
 - b. Tampa Electric began producing the lesser quality gypsum, or filter-press material, that is being landfilled for valley fill use at the end of 1999 with the commissioning of the Big Bend units 1 & 2 flue gas desulfurization ("FGD") systems. The gypsum was produced from the new FGD dewatering system filter press equipment that was installed as a common device to both scrubbers at Big Bend Station. Historically, the "lesser quality" or filter-press gypsum has been difficult to market due to the high concentrations of chlorides and moisture. The present specifications for chlorides in wallboard production is 120 ppm or

TAMPA ELECTRIC COMPANY DOCKET NO. 110262-EI STAFF'S FOURTH DATA REQUEST REQUEST NO. 4 PAGE 2 OF 5 FILED: AUGUST 01, 2012

less, cement production, less than 200 ppm and agriculture less than 1000 ppm. With the average chloride content of 1500 ppm, the filter press gypsum does not meet current customer specifications for wallboard and cement production or agricultural applications.

Prior to the decline of the construction industry, Tampa Electric required two cement producers and one agriculture customer to take a 20 percent portion of filter press material along with better quality gypsum. As new FGD systems entered the market, the supply of higher quality gypsum decreased the marketability of the lower quality gypsum to these customers. In addition, Tampa Electric asked the respondents to its letter of interest if they would be willing to receive any of this gypsum. All of the respondents declined the offer.

- c. The total cost for disposal will be approximately \$8.9 million (348,929 tons multiplied by \$25.44 per ton). This cost could vary with the price of fuel used to transport the gypsum to the landfills or with variations in the amount in the estimated tons of gypsum that is being landfilled.
- d. Yes, the landfill of 350,000 tons of lower quality gypsum for valley fill application is a one-time event. The material will be used to close out a storage cell in the landfill. The agreement with Republic Services Inc./Cedar Trails is for an estimated quantity ranging between 100,000 to 350,000 tons. The disposal began on July 2 and will be completed by year end. Tampa Electric has also entered into a similar agreement with Omni Waste Services for up to 100,000 tons of gypsum also by year end. The total pricing for both these agreements is identical.
- e. Tampa Electric currently estimates that the removal of the 350,000 tons of lesser quality gypsum will be complete in four to six months. The time required to move this material may be impacted primarily by weather.
- f. Assuming only the existing storage site, the 2012 year-end inventory of gypsum is estimated at 695,724 tons. The projected 2013 gypsum production is 705,261 tons. Including 2013 new sales commitments, sales of off-spec gypsum to the Florida agricultural market and assuming National Gypsum takes its forecasted 350,000 tons of gypsum in 2013, Tampa Electric's inventory in the existing storage facility will exceed 870,000 tons by 2014.
- g. Please see the attached correspondence from Tampa Electric wherein the company outlined short-, mid-, and long-term plans of action to minimize fugitive dust emissions from the gypsum operation. Although a formal response has not been received, verbal indications from the Environmental Protection Commission of Hillsborough County are that the plan is satisfactory to the County.

May 31, 2012

Mr. Jason Waters, P.E. Environmental Protection Commission Hillsborough County (EPCHC) 3629 Queen Palm Drive Tampa, FL 33619-1309 Via FedEx Airbill No. 7984 5592 1925

Re: Tampa Electric Company - Big Bend Station Title V Permit Number 0570039-045-AV Caribbean Isles Gypsum Storage Plan of Action Facility ID No. 0570039

Dear Mr. Waters:

This letter outlines the Tampa Electric Company (TEC) proposed gypsum storage plan of action to address the concerns of the Caribbean Isles community. This proposed plan of action has been developed based on feedback from residents during the Caribbean Isles town meeting on April 26, 2012 and the follow-up meeting with the Environmental Protection Commission of Hillsborough County (EPCHC) on May 09, 2012. The background, proposed plan of action and implementation schedule follows.

Background

On April 5, 2012, TEC attended a Caribbean Isles weekly meeting to address comments regarding dust deposition in the community and potential air impacts to residents. After the meeting, EPCHC was consulted and agreed to provide information on local ambient air monitoring and health effects at a future meeting.

On April 26, 2012, TEC and EPCHC presented follow-up information at another Caribbean Isles weekly meeting to further address comments regarding dust deposition and potential air impacts. TEC presented information on the environmental necessity of generating gypsum as part of air regulations compliance, local dust sampling results, TEC's exemplary recycling record, current gypsum pile management, future plans for gypsum management, and gypsum market opportunities being pursued. EPCHC provided an overview of services, discussed the location of ambient air monitors, results of ambient monitoring, and elaborated on the EPA $PM_{2.5}$ standard. Numerous questions from the residents were answered by TEC and EPCHC.

Mr. Jason Waters May 31, 2012 Page 2 of 3

On May 9, 2012, TEC and EPC met to review the action items and concerns discussed at the April 26, 2012 meeting. The topics included ideas for mitigating noise from truck unloading/loading, dust impacts/proposed action, gypsum health effects and development of a response plan.

Short-Term Plan of Action

Although dust sampling to date does not indicate that there is excessive gypsum dust impacts to Caribbean Isles, TEC is evaluating several options to minimize fugitive dust emissions from the gypsum storage area. This includes surfactant application, water truck to spray piles, permanent sprinkler system, covering/tarping and planting vegetation on the gypsum piles. TEC has rented a water truck with a water cannon spray nozzle and has already begun a watering regiment to reduce potential dusting issues while other options are evaluated.

TEC is evaluating noise mitigation opportunities in response to the resident that mentioned occasional short-duration noise presumably caused by truck loading or unloading.

Mid-Term Plan of Action

TEC proposes to reconfigure the height and general arrangement of the gypsum piles by December 2012. The lower profile will minimize the wind erosion on the piles and further minimize the amount of fugitive emissions generated, particularly during high wind events. The reduced pile height will require the gypsum pile to be reconfigured and distributed over a larger area. This plan will require an engineering analysis of the current pile configuration and the design of the reconfigured gypsum pile.

Long-Term Plan of Action

TEC is in the process of getting regulatory approvals and permitting for a new gypsum handling and storage facility nearly a mile northeast of the current location and directly adjacent to the gypsum wallboard manufacturer contracted to purchase the gypsum. If all approvals are obtained, the new facility will consist of a radial stacker and stock out pile, a gypsum storage dome, and a gypsum pile management area.

Gypsum from the existing Big Bend Station processing area will be transferred by an enclosed "pipe" conveyor to the radial stacker. The radial stacker will then transfer the gypsum to the stock out pile. Gypsum will be reclaimed from the stock out pile using mobile equipment (e.g., front end loaders) either directly to an above grade reclaim hopper or to the gypsum pile management area. Gypsum will be transferred from the reclaim hopper to covered belt conveyors to either the truck/rail load out silo or to a conical storage pile located inside the gypsum storage dome.

The current gypsum storage and handling facility will remain a permitted storage facility and will not be shutdown or demolished. The facility will serve as a secondary storage area. TEC will utilize best management practices to minimize the use of this facility.

Mr. Jason Waters May 31, 2012 Page 3 of 3

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TEC believes the proposed plan of action is the most appropriate plan for mitigating the concerns expressed by the residents of the Caribbean Isles Community. Please contact me at (813) 228-1282 or Robert Velasco at (813) 228-4232, if you have any questions or comments regarding this proposed plan of action.

Sincerely,

Byron T. Burrows, P.E., BCEE Manager - Air Programs Environmental, Health & Safety

EHS/rlm/RAV149

cc Cindy Zhang-Torres DEP Diana Lee, EPCHC bc: A.D. Bosshart **B.T.** Burrows A.A. Denham D. Driggers T.L. Hernandez C. L. Jacobs T.S. Parsons L.A. Pence M.A. Proulx W.A. Smotherman T.J. Szelistowski C.S. Whitworth T. Wilder K.O. Zwolak AC 4.1.16 C 2.1

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