FLORIDA DEPARTMENT OF Environmental Protection

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September 25, 2020

By: Electronic Mail: Betty.Carter@duke-energy.com

Ms. Betty Carter, Environmental Coordinator
Duke Energy Florida
Longwood Operations Center
150 Progress Energy Way
Longwood, FL 32750

Subject: Duke Energy Florida, LLC (DEF) Updated 2020 Mineral Oil Dielectric Fluid (MODEF) Voluntary Cleanup Program (VCP), dated September 2020

Dear Ms. Carter:

The Florida Department of Environmental Protection (Department) has reviewed and approves the immediate use of the DEF updated Mineral Oil Dielectric Fluid (MODEF) Voluntary Cleanup Program (VCP), dated September 2020 and attached as Exhibit A. The 2020 MODEF-VCP revises and updates, and is intended to replace, the previous Progress Energy Florida MODEF-VCP dated May 2011 and approved by the Department on September 16, 2011.

The updated 2020 MODEF-VCP has been developed through a series of discussions, meetings, and drafts which have resulted in the final September 2020 MODEF-VCP. The Department has determined that this DEF September 2020 MODEF-VCP is in general accordance with the Department's May 2016 *Guidance for Mineral Oil Dielectric Fluid Emergency Response Action Protocol* (Rule 62-780.100(22), F.A.C.) as specifically set forth in the MODEF-VCP. Furthermore, the MODEF-VCP is consistent with Chapter 62-780, F.A.C. Contaminated Site Cleanup Criteria, including applicable provisions of specific rules within Chapter 62-780, F.A.C. which are cited in the MODEF-VCP.

DEF intends to address and respond to MODEF discharges from electrical transformers/equipment and substation facilities under the applicable MODEF-VCP provisions and protocols utilized within the DEF service area throughout the State of Florida. In addition, the MODEF-VCP covers MODEF discharge responses which address the possibility of polychlorinated biphenyls (PCB) concentrations within the failed or leaking electrical equipment.

As such, the Department has determined through this approval and use authorization that the DEF MODEF-VCP dated September 2020 is sufficient and satisfactory to address releases of MODEF at DEF substation, transformer, and other electrical equipment sites in a manner that is protective of human health and the environment under Florida law and applicable Department rules.

If you have any questions regarding this Department approval and authorization letter, please contact Michael Bland at mike.bland@floridadep.gov or by phone (850)245-8912.

Sincerely,

Tim J. Bahr Digitally signed by Tim J. Bahr
Date: 2020.09.25
12:05:51 -04'00'

Tim J. Bahr, P.G., Director
Division of Waste Management

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