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Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

December 22, 1993

Ms. Lynn Milanian
Permitting Engineer
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: Tampa Electric Company
Plant City Operations Center - Garage
Oily Water in Hydraulic Lift Pits
WD 93-95

Dear Ms. Milanian:

The purpose of this letter is to confirm the information discussed in your telephone conversation with Gwen Shofner earlier today. In that phone call Ms. Shofner self-reported, on Tampa Electric Company's behalf, that oily water contained in the hydraulic lift pits at Tampa Electric Company's Plant City Operations Center may be hazardous, based on analytical data forwarded to the Company's Environmental Planning Department on December 21st, 1993.

The analytical results for Total Metals indicated that cadmium, chromium, and lead are present in the waste at concentrations in excess of Toxicity Characteristic (TC) threshold limits. Due to the composition of the waste (i.e., 87% oily water and 13% soil sediment), it is likely that Toxicity Characteristic Leaching Procedure (TCLP) analysis would also indicate the presence of these metals at hazardous concentrations.

The hydraulic lift pits at the Plant City facility are lined with concrete, which provides full containment of the waste.

Upon reviewing the subject analytical results, the Company decided that further characterization of this waste stream was unnecessary. In an abundance of caution, the Company has elected to treat this material as a hazardous waste and deal with it accordingly.

After determining this course of action, Tampa Electric Company immediately contacted

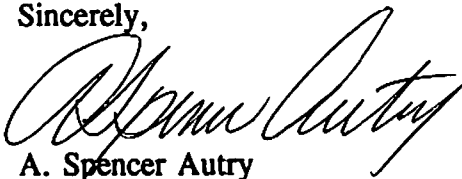
Laidlaw Environmental Services, a permitted hazardous waste transporter and disposer. Laidlaw was requested to bring a hazardous waste vacuum truck to the Plant City Operations Center site for evacuation and hazardous waste disposal of the oily water in the most expedient manner possible.

Laidlaw has agreed to provide these services on December 29th, 1993, which is the earliest date that Laidlaw's hazardous waste vacuum truck will be available. The oily water will remain confined in the concrete lift pits until that time. On that date, Laidlaw will evacuate the oily water from the lift pits, containerize it in DOT approved drums, and transport it off-site for disposal as hazardous waste. After evacuating the oily water, Laidlaw will decontaminate the hydraulic lift pits.

The decontamination rinsewater will be containerized in DOT approved drums and left on-site. Tampa Electric will then characterize the decontamination rinsewater and dispose of it in an appropriate manner. Tampa Electric Company will provide written confirmation to the Department after the evacuation and disposal of oily water, followed by decontamination of the lift pits, have been completed.

If you have any questions concerning this information, please contact Ms. Shofner at (813) 228-4842.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Spencer Autry".

A. Spencer Autry
Director
Environmental

dib/GLS182

cc: Jim Estes