

**Gainesville Regional Utilities
Deerhaven Generating Station**

Coal Combustion Residuals Fugitive Dust Control Annual Report

(October 2023 - September 2024)

Prepared for:

Gainesville Regional Utilities
Gainesville, Florida



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1.0 Introduction

Gainesville Regional Utilities (GRU) operates the Deerhaven Generating Station (facility) located in Gainesville, Florida. The facility has the ability to generate electricity from a variety of sources, including coal. When generated, coal combustion residuals (CCR) were either beneficially used or managed at an onsite CCR landfill and the CCR surface impoundment system, which underwent closure by removal of in-place CCRs and is currently managing non-CCR waste streams. For regulatory purposes, the CCR landfill is considered a CCR unit. The surface impoundment system is no longer considered a CCR unit and is not regulated by the provisions of the federal CCR regulations (40 CFR 257 Subpart D) after its closure in March 2024. The CCRs generated in the past and managed at this facility include bottom ash, fly ash, and flue gas desulfurization byproduct.

This fugitive dust control annual report was created per the requirements of 40 CFR 257.80(c). This report includes a list of fugitive dust emission events and the control measures implemented to mitigate the emissions, a list of any citizen complaints received by the facility, and an evaluation of the effectiveness of the current fugitive dust control measures. This annual report covers the period from 1 October 2023 through 30 September 2024 (referred herein to as the report period).

2.0 Fugitive Dust Emission Events and Corrective Measures Implemented

The following facility areas are identified in the CCR Fugitive Dust Control Plan as potential sources of CCR fugitive dust emissions: the CCR landfill and paved and unpaved roads. All these areas are visually monitored during weekly inspections for dust emissions or for conditions that may contribute to an elevated risk of dust emissions (e.g., uncompacted piles of material in the active area of the CCR landfill). The CCR contained in Ash Cell #2 of the surface impoundment system ponds before closure in April 2024 was either inundated with process water or too wet to result in dust emission. Ash Cell #1 was closed in May 2023 and was inundated with process water for the entire report period. A draft closure certification report for the surface impoundment system closure was submitted to the Florida Department of Environmental Protection on May 24, 2024.

Innovative Technical Solutions engineers visited the surface impoundment system on numerous occasions during the reporting period (e.g., 10/10/2023, 10/26/2024, 11/2/2023, 11/7/2023, 11/10/2023, 11/13/2023, 11/29/2023, 12/4/2024, 12/14/2023, 1/3/2024, 1/10/2024, 1/25/2024, 1/26/2024, 2/1/2024, 2/12/2024, 2/16/2024, 2/22/2024, 2/26/2024, 3/4/2024, 3/5/2024, 3/7/2024, 3/15/2024, 3/21/2024, 3/25/2024, 4/1/2024, 4/2/2024) and did not observe dust emissions during any of these visits.

The weekly inspection reports from the reporting period were reviewed to compile a list of fugitive dust emissions or emission-related events, identify the cause(s) of the dust emissions (if any), and review the measures implemented to control the dust emissions.

Visible dust emissions were not observed during any of the weekly inspections conducted during the reporting period. Table 2-1 presents a list of operating conditions that could result in an

increased risk of dust emissions, as recorded by GRU personnel during the reporting period, with the date, inspector name, and inspector and supervisor notes for each event. The presence of unloaded CCRs piles awaiting spreading and compaction were recorded in fourteen (14) weekly inspection reports. Visible dust emissions from the disposal area were not observed from these piles. However, experience from CCR landfill operation suggests that loose CCR piles present an increased likelihood of dust emissions. On all 14 occasions associated with the presence of unloaded CCRs piles, the loose material was spread and compacted within one week of observation.

Table 2-1. Fugitive Dust Emission-Related Events

Date	Inspector	Inspector Notes	Supervisor Notes
1/22/2024	R Gainey	Loose piles in cell 3	Still waiting for Ash Grove decision
1/29/2024	R Gainey	Loose piles on active surface area	Some will be spread this week still holding Big Piles for Ash Grove
2/5/2024	W Williams	Loose piles cell 3	Will spread by end of week
2/12/2024	S Diepersloot	There are loose piles on cell 3	Will spread by end of week
2/19/2024	R Gainey	Loose piles in ash cell 3	Will spread by end of week
2/26/2024	W Williams	Loose piles in cell 3	Will spread by end of week
3/11/2024	S Diepersloot	Loose piles on cell 3	Will spread by end of week
4/8/2024	S Diepersloot	Loose piles on cell 3	Will spread by end of week
4/15/2024	S Diepersloot	Loose piles on cell 3	Will spread by end of week
4/22/2024	R Gainey	Loose piles on cell 3	Will spread by end of week
5/13/2024	W Williams	Piles cell 1 & 2	Will spread by end of week
5/20/2024	R Gainey	Loose piles/materials	Will spread by end of week
6/17/2024	S Diepersloot	Loose piles on cell 1	Will spread after drying
7/1/2024	R Gainey	Loose piles on cell #1, #2	Will spread by end of week

3.0 Citizen CCR Dust Complaint

GRU did not receive any citizen complaints related to dust emissions from the facility during the reporting period.

4.0 Assessment of Dust Control Plan Effectiveness

No additional dust control measures were necessary to prevent/mitigate dust emissions at the CCR units beyond the typical measures described in the CCR Fugitive Dust Control Plan. The absence of any reoccurring dust emissions or citizen complaints suggests that the current measures provide effective fugitive dust control.