

Corrective Measures to Address Deficiencies Noted in the Coal Combustion Residual Units Annual Inspection Report

(Annual inspection covering the period from October 17, 2015 - January 8, 2016)

As promulgated in Title 40 of the Code of Federal Regulations, Part 257.107(g)(6), Gainesville Regional Utilities (GRU) is required to post documentation detailing the corrective measures taken to remedy the deficiencies noted in annual inspections on a publically accessible internet site. Table 1 summarizes the efforts taken by GRU to address each of the noted deficiencies. Documents which provide additional details on each remedy are attached in a series of appendices; Table 1 shows which of the appendices correspond to each deficiency remedy.

CCR Unit	Location	Previous Condition	Remedy Action	Date of Remedy Completion	Appendices
Surface Impoundment System	Ash Cell #1 Butterfly Valve	Inoperative Valve	Valve Replaced	3/30/2016	A
	Northwest Exterior Slope of Ash Cell #1 and #2	Animal Burrows	Burrows Inspected, Filled and Packed with Soil	1/29/2016 (Inspected) 2/11/2016 (Filled and Packed)	B, C
Landfill	Southern End of N-S Stormwater Drainage Ditch Located Along East Cell 4	Occluded Culvert	Culvert Flushed Out and Inlet Re-Armored	2/11/2016	B
	Southern Exterior Side Slope and Southern Portion of Western Exterior Side Slope	Animal Burrows	Burrows Inspected, Filled and Packed with Soil	1/29/2016 (Inspected) 2/11/2016 (Filled)	B, C

APPENDIX A



CCR Surface Impoundment Weekly Inspection Form

Inspector's Name: G. FULLINGER

Date: 4/4/16 Time: 1530

Impoundment Name: Ash Cell		Impoundment I.D.: 1			
CCR unit water elevation (ft NGVD29): <u>188.0</u>					
<p><i>Check the appropriate column (Yes/No) below. Any line item checked as "Yes" should be further explained in the comments section on the back of the page referring to the impoundment name, I.D., and line item number. Any unusual condition should be noted in the comments section on the back of the page.</i></p>					
	Yes	No		Yes	No
1		X	9		X
2		X	10		X
3		X	11		*
4		X	12		X
5		X	13		X
6		X	14		*
7		X	15		X
8		X			

Impoundment Name: Ash Cell		Impoundment I.D.: 2			
CCR unit water elevation (ft NGVD29): <u>189.3</u>					
<p><i>Check the appropriate column (Yes/No) below. Any line item checked as "Yes" should be further explained in the comments section on the back of the page referring to the impoundment name, I.D., and line item number. Any unusual condition should be noted in the comments section on the back of the page.</i></p>					
	Yes	No		Yes	No
1		X	9		X
2		X	10		X
3		X	11		X
4		X	12		X
5		X	13		X
6		X	14		*
7		X	15		X
8		X			



CCR Surface Impoundment Weekly Inspection Form

CCR Unit Name, ID- Line Item #

Comment

ASH CELL, 1 - #11 - BUTTERFLY VALVE WAS REPLACED ON 3-30-16 AND IS NOW FULLY FUNCTIONAL

ASH CELL, 1 - #14 - OUTLET PIPE FROM ASH CELL 1 TO PUMP BACK POND 1 IS ~11 FEET UNDER WATER. NO ABNORMALITIES NOTED

ASH CELL, 2 - #14 - OUTLET PIPE FROM ASH CELL 2 TO PUMP BACK POND 2 IS ~11 FEET UNDER WATER. NO ABNORMALITIES NOTED.

Inspector Signature

APPENDIX B

Work Order	61201 (DH) ADDRESS DEFICIENCIES AS IDENTIFIED IN CCR ANNUAL INSPECTION	Scheduled Start Date	02/02/2016
Status	COMPLETED	WO Type	CM
Parent Work Order		Class	
Department	CA COAL/ASH	Priority	P3
PM Code		Warranty	N
Cost Code		Safety	N
Problem Code		Equip Criticality	
Reported By	SWEATDF DAN SWEAT	Assigned To	FOWLERJN
Project		Assigned By	SWEATD
Standard WO			
Equipment	LANDFILLS (DH)		
Location			
Equipment Manufacturer		Estimated Hours	8
Equipment Model	LANDFILLS		
Equipment Serial Number			
Date Started	02/02/2016	Date Completed	02/11/2016

Equipment User Defined Fields

Work Order Comments

SWEATDF [02/02/2016 16:12]:

ADDRESS DEFICIENCIES AS IDENTIFIED IN CCR ANNUAL INSPECTION REPORT.

FOWLERJN [02/11/2016 15:16]:

THE ANIMAL BURROWS THAT WERE IDENTIFIED IN THE ANNUAL INSPECTION WAS DETERMINED NOT TO BE LIVE ANIMAL DEWLLINGS. THE HOLE WERE FILLED WITH TOP SOIL AND PACKED IN.

WHITERA [02/11/2016 13:56]:

ON 2/4/2016 LOCATED CULVERT INLET ON ENTRANCE ROAD TO LANDFILL, PLACED RIP RAP AROUND MOUTH , CLEANED AROUND OUTLET AND FLUSHED WITH WATER TRUCK.

FOWLERJN [02/11/2016 15:18]:

THE CULVERT AT THIS TIME IS FLOWING. THERE IS SEDIMENT IN THE BOTTOM OF THE PIPE, BUT AT THIS TIME I WOULD WARNT NOT TO MESS WITH IT UNTILL IT CAUSES A PROBLEM.

Activities

Activity	Trade	Est. Hours	People Req.	Task	Description
10	C/A	8	1		

APPENDIX C

Deerhaven Coal Combustion Residual Annual Inspection Animal Burrow Inspection

Joe Wolf
GRU Forester
352-339-6616
wolfpj@gru.com
January 29, 2016

Methodology

I visited the Deerhaven site Friday, January 29th to inspect for suspected gopher tortoise burrows present on the CCR surface impoundment and CCR landfill. I inspected these burrows with Joey Fowler. My investigation consisted of a field visit to each hole that were flagged during the CCR annual inspection, followed by close inspection of the hole and surroundings. All holes inspected were vacant. Additional burrows located on the southern slope of the landfill and northwest side of the surface impoundment system were also inspected.

Conclusions

These holes were not made by gopher tortoises. I based these findings on the following criteria:

- Size – the holes were roughly 3” in size, gopher tortoises are typically 10-14” in size and need an opening of that size or larger
- Depth – these holes were 12” or less (1 foot) deep, gopher burrows have a depth of 120” (10 feet)
- Shape – these holes were irregular in shape with rough edges, gopher holes are oval in shape with smooth edges. The top of a gopher tortoise burrow is rounded and shaped like their shells.
- Location – these holes were on a fairly sloped Bahia grass surface, gopher tortoise prefer flat sites with gentle slopes. Gopher tortoise frequent longleaf pine ecosystems and are also present in beach dunes. These sites have a food source and small shrubs needed for cover from predators. Gopher tortoises also have a small home range and do not venture far for food. This area is simply not a preferred site for a gopher tortoise. It lacks the necessary food and cover from predators.

These burrows/excavations were likely made by possum or armadillos searching for food (grubs, roots or tubers). The soil was excavated one time in a search for food, and hole abandoned as evidenced by the grass and vegetation growing on the top of the excavated soil. These types of small holes are present in other areas on the Deerhaven site, generally on the edges of mowed roads. The current mowing regime makes this a preferred area for these animals to search and dig for food, and I would expect to see this type of activity continue in the future.

Qualifications

I have a Bachelor of Science in Forestry and 20 years of experience with forest resource management. I have worked with gopher tortoise burrows on logging sites and sandhill restorations, observing both active and inactive gopher burrows/nests. My experience also includes 20 years on the Deerhaven site. I have walked these woods and site for decades. I know the forest and wildlife characteristics of this tract.