

## **Corrective Measures to Address Deficiencies Noted in the Coal Combustion Residuals Units Annual Inspection Report**

**(Annual inspection covering the period from December 13, 2017 – December 12,  
2018)**

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 publicly accessible internet site. Table 1 summarizes the efforts taken by GRU to address each of the deficiencies noted in the 2018 annual inspection. As available, documents which provide additional detail on the dates and actions taken to address the deficiencies are included in a series of attachments; Table 1 shows which attachment corresponds to each deficiency corrective measure.

**Table 1. Remedies Taken to Address Deficiencies Noted in the 2018 CCR Units Annual Inspection Report**

CCR Unit	Location	Previous Condition	Remedy Action	Attach.	Date of Remedy Completion
Surface Impoundment System	Ash Cells #1 and 2	Elevated water level	Water pumped to process water plant to provide 2 ft freeboard in Ash Cells 1 and 2	A	12/26/2018
	External Slope of Ash Cell #1, Southside	Animal Forage Holes (x1)	Animal forage hole was filled in.	A	12/26/2018
Landfill	Cell 1 Downcomers	CCRs are transported to the Northern Drainage Ditch through downcomers.	Silt fence was installed and hay bales around the downcomers inlets were replaced	B	1/4/2019-1/14/2019
		Hay bales damaged and displaced	Silt fence was installed and hay bales were replaced	B	1/4/2019-1/14/2019
		Erosion near the outlet of a downcomer	Material placed and packed in per Richard White		2/15/2019
	Underdrains	Water level in the Northern Drainage Ditch is above the underdrains	Process plant was notified to pump water from drainage ditch. The water level was not reported to be above the underdrains in two subsequent inspections	B	Before 01/07/2019
	Northern Edge of Cell 4	Ponding	Drain pipe jetted and cleaned by wastewater division per Richard White		07/18/2019

# **ATTACHMENT A**



## CCR Surface Impoundment Weekly Inspection Form

Inspector's Name: Gale Fillingier

Date: 12/26/2018 Time: 11:20

Impoundment Name: <b>Ash Cell</b>		Impoundment I.D.: <b>1</b>			
CCR unit water elevation (ft NGVD29): 192.8 ft					
<i>Check the appropriate column (Yes/No) below. Any line item checked as "Yes" should be further explained in the inspector notes section referring to the impoundment name and ID, and line item number. Any unusual condition should be addressed in the supervisor comments section with notes on the action(s) that will be taken to address the condition.</i>					
	Yes	No		Yes	No
1 Is water elevation abnormally high (greater than 193 ft NGVD 29) or low?		✓	9 Any animal burrows on the side slopes?		✓
2 Are there bare patches or un-vegetated areas on slopes?		✓	10 Any boils or excessive, turbid, or sediment-laden seepage?		✓
3 Vegetation height greater than 6 inches on outer slopes?		✓	11 Butterfly valve at stoplog structure damaged, or not in good working order?		✓
4 Shrubs or trees located on armored, inner slopes?		✓	12 Abnormal discoloration/ foaming in water?		✓
5 Any inner/outer slope erosion (e.g., rills, scarps, sloughing)?		✓	13 Any non-ash sediments/debris floating in water?		✓
6 Any visible slope bulging?		✓	14 Is there any abnormal discoloration, foaming, flow or discharge of debris/sediment or signs of internal corrosion at the outlet of pipe from Ash Cell 1 to Pump Back Cell 1?		**
7 Any visible depressions in slope or near toe of outside slopes?		✓	15 Groundwater monitoring well damage?		✓
8 Any visible cracks (transverse, longitudinal, or desiccation) on slopes?		✓	16 Any other unusual condition?		✓

Impoundment Name: <b>Ash Cell</b>		Impoundment I.D.: <b>2</b>			
CCR unit water elevation (ft NGVD29): 192.4 ft					
<i>Check the appropriate column (Yes/No) below. Any line item checked as "Yes" should be further explained in the inspector notes section referring to the impoundment name and ID, and line item number. Any unusual condition should be addressed in the supervisor comments section with notes on the action(s) that will be taken to address the condition.</i>					
	Yes	No		Yes	No
1 Is water elevation abnormally high (greater than 193 ft NGVD 29) or low?		✓	9 Any animal burrows on the side slopes?		✓
2 Are there bare patches or un-vegetated areas on slopes?		✓	10 Any boils or excessive, turbid, or sediment-laden seepage?		✓
3 Vegetation height greater than 6 inches on outer slopes?		✓	11 Butterfly valve at stoplog structure damaged or not in good working order?		✓
4 Shrubs or trees located on armored, inner slopes?		✓	12 Abnormal discoloration/ foaming in water?		✓
5 Any inner/outer slope erosion (e.g., rills, scarps, sloughing)?		✓	13 Any non-ash sediments/debris floating in water?		✓
6 Any visible slope bulging?		✓	14 Is there any abnormal discoloration, foaming, flow or discharge of debris/sediment or signs of internal corrosion at the outlet of pipe from Ash Cell 2 to Pump Back Cell 2?		**
7 Any visible depressions in slope or near toe of outside slopes?		✓	15 Groundwater monitoring well damage?		✓
8 Any visible cracks (transverse, longitudinal, or desiccation) on slopes?		✓	16 Any other unusual condition?		✓



## CCR Surface Impoundment Weekly Inspection Form

<b>Inspector Notes</b>	
<b>CCR Unit Name and ID, Line Item #</b>	<b>Notes</b>
Ash Cell 1, #9	Filled in animal forage hole on the West slope of Ash Cell 1 that was identified during annual inspection.
Ash Cell 1, #14	Outlet pipe is approximately 11 feet under water. Nothing abnormal noted.
Ash Cell 2, #14	Outlet pipe is approximately 11 feet under water. Nothing abnormal noted.

  
 \_\_\_\_\_  
 Inspector Signature

<b>Supervisor Comments</b>		
<b>CCR Unit Name and ID, Line Item #</b>	<b>Comment</b>	<b>Estimated Date of Repair/Action</b>
Ash Cell 2, #1	Impoundment level have returned to normal.	

  
 \_\_\_\_\_  
 Supervisor Signature

# **ATTACHMENT B**

### GRU CCR Landfill Weekly Inspection Form

<b>Inspector Name</b>	Jose Walker		
<b>Inspection Date</b>	4/7/18	<b>Start Time</b>	0800
		<b>End Time</b>	0900

#### Field Conditions

<b>Wind Condition (Circle all Applicable)</b>	<u>Calm</u> Light Moderate Strong Gusty	<b>Sky Cover (Circle One)</b>	<u>Clear</u> Partly Cloudy Overcast
<b>Surface Condition (Circle One)</b>	Dry / <u>Wet</u>	<b>Precipitation (Circle One)</b>	<u>None</u> Light Heavy


#### Inspection Checklist

Inspection Area	No.	Inspection Items	Inspection Status (Check One)		
			Acceptable	Area of Concern (complete notes)	Needs Attention (complete notes)
Access Roads/ Ramps	1	Navigable, Erosion, Rutting, Ponding	✓		
	2	Dust Emissions	✓	/	
External Side Slopes	3	Erosion (cracks, rills, scarps, sloughs, depressions), animal burrows	✓		
	4	Vegetation Height (< 6 inches)	✓		
	5	Uncovered/Exposed CCR		✓	
Groundwater Monitoring Wells	6	Visible Damage	✓	/	
Surface - Active Area	7	Erosion (cracks, rills, scarps, sloughs, depressions), Unstable Areas	✓		
	8	Ponding, Vegetation Height (No Shrubs/Trees)	✓		
	9	Dust Emissions, Compaction, Loose Pile Minimization	✓	/	
Surface - Inactive Area	10	Erosion (cracks, scarps, depressions), Unstable Areas	✓		
	11	Ponding, Vegetation Height (No Shrubs/Trees)	✓		
	12	Dust Emissions	✓	/	
Stormwater	13	Culverts/Ditches Clogged (with Sediment or Vegetation), Damaged, Eroded	✓		
Contact Water	14	Water Level Above Underdrains	✓	/	
	15	Downcomer Pipes Clogged or Damaged	✓		
	16	Hay Bales Staked and Intact		✓	
	17	Ash Canal Overtopping, Sediment Accumulation, Bank Erosion		✓	

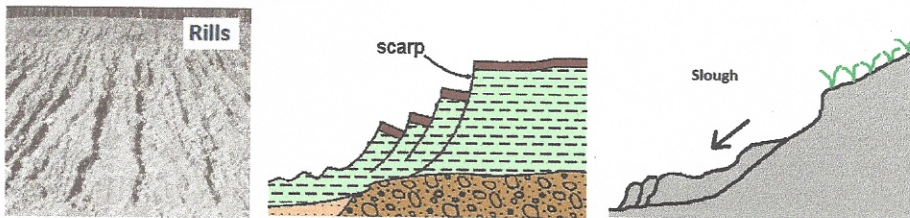
### Inspector Notes

Checklist No.	Observations
5	Berm construction still in progress
16	Hay bales need to be replaced
17	South east side of canal erosion fixed, could start again with coming rain

**Area of Concern:** may develop into a "Needs Attention" area if not addressed. Monitor situation and reevaluate during next inspection. Address as necessary.

  
 Inspector Signature

**Needs Attention:** currently or imminently presents a human health, operational or environmental hazard/problem. Address as soon as possible.



### Supervisor Notes

Checklist No.	Comments	Estimated Date of Repair/Action
5	Top of landsill too wet for navigation	1-14-2019
16	Silt fence installed on 1-4-2019	
"	Hay bales to be removed	1-8-2019
17	Placed silt fence in flow path for diversion	
		1-7-2019

  
 Supervisor Signature



## GRU CCR Landfill Weekly Inspection Form

<b>Inspector Name</b>	Travis Parker		
<b>Inspection Date</b>	1-14-19	<b>Start Time</b>	830
		<b>End Time</b>	930

### Field Conditions

<b>Wind Condition (Circle all Applicable)</b>	Calm <u>Light</u> Moderate Strong Gusty	<b>Sky Cover (Circle One)</b>	Clear <u>Partly Cloudy</u> Overcast
<b>Surface Condition (Circle One)</b>	Dry / <u>Wet</u>	<b>Precipitation (Circle One)</b>	<u>None</u> Light Heavy

### Inspection Checklist

Inspection Area	No.	Inspection Items	Inspection Status (Check One)		
			Acceptable	Area of Concern (complete notes)	Needs Attention (complete notes)
Access Roads/ Ramps	1	Navigable, Erosion, Rutting, Ponding	✓		
	2	Dust Emissions	✓	/	
External Side Slopes	3	Erosion (cracks, rills, scarps, sloughs, depressions), animal burrows	✓		
	4	Vegetation Height (< 6 inches)	✓		
	5	Uncovered/Exposed CCR		✓	
Groundwater Monitoring Wells	6	Visible Damage	✓	/	
Surface - Active Area	7	Erosion (cracks, rills, scarps, sloughs, depressions), Unstable Areas	✓		
	8	Ponding, Vegetation Height (No Shrubs/Trees)	✓		
	9	Dust Emissions, Compaction, Loose Pile Minimization		/	✓
Surface - Inactive Area	10	Erosion (cracks, scarps, depressions), Unstable Areas	✓		
	11	Ponding, Vegetation Height (No Shrubs/Trees)	✓		
	12	Dust Emissions	✓	/	
Stormwater	13	Culverts/Ditches Clogged (with Sediment or Vegetation), Damaged, Eroded	✓		
Contact Water	14	Water Level Above Underdrains	✓	/	
	15	Downcomer Pipes Clogged or Damaged	✓		
	16	Hay Bales Staked and Intact		✓	
	17	Ash Canal Overtopping, Sediment Accumulation, Bank Erosion	✓		

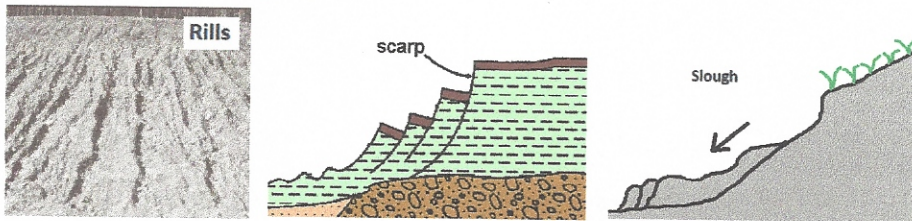
### Inspector Notes

Checklist No.	Observations
5	Berm construction still in progress
9	Some piles hauled over the weekend need to be spread
16	Hay bales need to be finished being installed

**Area of Concern:** may develop into a "Needs Attention" area if not addressed. Monitor situation and reevaluate during next inspection. Address as necessary.

**Needs Attention:** currently or imminently presents a human health, operational or environmental hazard/problem. Address as soon as possible.

*Parker*  
Inspector Signature



### Supervisor Notes

Checklist No.	Comments	Estimated Date of Repair/Action
5	Will try to continue this week	1-14-19
9	Spreading piles today	1-14-19
16	Hay Bales installation started 1-12-19	
	-to be finished today	1-14-19

*Michael A. Wilts*  
Supervisor Signature