

**Gainesville Regional Utilities  
Deerhaven Generating Station**

**Coal Combustion Residuals Fugitive Dust Control**

**Annual Report**

**(October 2015- September 2016)**

**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 produces electricity from a variety of sources, including coal. Coal combustion residuals (CCR) generated at the facility are either beneficially used or managed at a CCR surface impoundment system (which includes two ash cells) and/or a CCR landfill. For regulatory purposes, the CCR surface impoundment system and CCR landfill are considered CCR units. The CCR material generated and managed at this facility includes bottom ash, fly ash and flue gas desulfurization (FGD) 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 19 October 2015 through 30 September 2016.

## 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, the CCR surface impoundment system, and paved and unpaved roads. Except for the surface impoundment system, all these areas are visually monitored on a weekly basis for dust emissions or for conditions that may contribute to an elevated risk of dust emissions (e.g., loose piles of material in the active area). The CCR contained in the impoundment system were inundated with process water and were not dredged for disposal at the landfill for the reporting period. The impoundments, therefore, were not deemed as a potential source of fugitive dust for the reporting period. IWCS engineers visited the surface impoundment system several times during the reporting period 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 emission or emission-related events, identify the cause(s) of the dust emissions, and to review the measures implemented to control the dust emissions. Table 2-1 presents a list of all dust emission-related events recorded by GRU personnel during the reporting period. Two of the events were related to dust emissions being observed from the landfill access road/ramp and five of the events had to do with loose piles/uncompacted material on the active area of the landfill surface. While dust emissions were not noted on these occasions, landfill operation history suggests an increased likelihood of dust emission when loose piles of CCR material are present. Both access road/ramp dust emission events occurred on dry days and were mitigated by wetting the road with a water tanker. Fugitive dust emissions were not documented in the inspection forms for subsequent weeks, suggesting that wetting the road/ramp was effective in controlling dust emissions.

All five of the dust emission-related observations from the active areas were associated with a delay in spreading and compaction after unloading the incoming CCR. Three of the five events were observed in consecutive weeks and resulted from the unavailability of a dozer to spread and compact the material; the landfill dozer was down for repairs and GRU rented a dozer to compact the unloaded piles of CCR. In addition, dust emissions was mitigated via spraying using the water truck.

Table 2-1. Fugitive Dust Emission Incidences

Inspection Area	Date/Time	Inspector	Observation Type	Inspection Notes
Access Roads/ Ramps	10/19/2015 12:15 PM	R White	Area of concern	Dry weather causing dust - using water truck to mitigate. Later inspection found no issues.
	7/26/2016 7:52 AM	C Partin	Needs Attention	The access roads have a small amount of dusting but is being taken care of as needed. The water truck is being used to mitigate the dusting concern.
Surface - Active Area	10/19/2015 12:15 PM	R White	Area of concern	Loose material, dry weather- using water truck and packing with loader.
	11/9/2015 8:15 AM	S McMillan	Needs Attention	Landfill surface area from Cell 2 to Cell 3 has compaction and loose pile issues that will be addressed as weather permits.
	7/26/2016 7:52 AM	C Partin	Needs Attention	On the active area of the CCR Landfill there are piles that have not been pushed out. This is due to the D6 dozer being out of service. Ring Power is onsite working on the D-6 currently. The water truck is being used to mitigate the dusting concern.
	8/1/2016 9:45 AM	C Partin	Needs Attention	On the CCR Landfill there are piles that need to be pushed out. This is due to the D6 Dozer being out of service.
	8/10/2016 9:00 AM	S McMillan	Needs Attention	Loose piles on active area, needs to be worked. A bulldozer has been placed on rent to spread out all loose materials and piles.

**3.0 Citizen CCR Dust Complaint Logging**

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

### 4.0 Assessment of Dust Control Plan Effectiveness

The following dust control measures were implemented to prevent/mitigate dust emissions as a response to observations made during the reporting period:

1. Wetting the dust-producing surfaces (e.g., landfill access roads) with a truck equipped with a spray bar during dry and/or windy conditions.
2. Reduce the time interval between unloading and compacting loose material piles.

Please note that both of these control measures are part of the current CCR fugitive dust control plan. Based on the absence of citizen complaints, and the ability for GRU to mitigate the observed dust emissions using the control measures included in the dust control plan, the dust control plan for the CCR units appears to be effective.