

**Gainesville Regional Utilities  
Deerhaven Generating Station**

**Coal Combustion Residuals Fugitive Dust Control Annual Report**

**(October 2018 - September 2019)**

**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 CCRs generated 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 2018 through 30 September 2019.

## 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 during weekly inspections for dust emissions or for conditions that may contribute to an elevated risk of dust emissions (e.g., loose uncompacted piles of material in the active area of the CCR landfill). The bottom ash contained in the surface impoundment system ponds was inundated with process water and was not excavated and removed for disposal at the landfill during the reporting period. Therefore, the surface impoundment system was not considered a potential source of fugitive dust during the reporting period. Innovative Technical Solutions engineers visited the surface impoundment system a few times during the reporting period (e.g., 12/12/2018, 3/20/2019, 8/23/2019) 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 review the measures implemented to control the dust emissions. No visible dust emissions were identified during the reporting period.

Table 2-1 presents a list of operating conditions that could result in dust emission events recorded by GRU personnel during the reporting period with the date, time, inspector, and inspector and supervisor notes for each event. Twenty (20) events associated with the presence of unloaded CCRs piles awaiting spreading and compaction were recorded. Visible dust emission was not observed during any of these weekly inspections. However, experience from CCR landfill operation suggests that loose CCR piles present an increased likelihood of dust emissions. On each of these 20 occasions, the loose material was spread and compacted within one week of

observation. The supervisor estimated repair/action date in the inspection worksheets suggest that these loose piles were typically spread out and compacted within a couple of days of observation.

**Table 2-1. Fugitive Dust Emission-Related Events**

<b>Date/Time</b>	<b>Inspector</b>	<b>Inspector Notes</b>	<b>Supervisor Notes</b>
10/29/18 9:00 AM	T Parker	Some piles need to be spread	The unit is in outage and the piles are from weekend. Cleaning areas around the unit. They will be spread and packed in
11/5/18 9:00 AM	T Parker	Some piles from weekend need to be spread	Piles for the weekend because of outage will be spread and packed in
11/19/18 8:45 AM	T Parker	Some piles need to be spread from weekend	Spreading done daily
12/26/18 9:30 AM	T Parker	Several piles to be spread from weekend	Piles will be spread
1/14/19 9:30 AM	T Parker	Some piles hauled over the weekend need to be spread	Spreading piles today
1/22/19 9:00 AM	T Parker	Several piles from weekend need to be spread	Piles to be spread and packed in
1/29/19 10:00 AM	R White	Due to hauling over weekend – loose piles	Piles are being spread and packed in
2/4/19 8:30 AM	J Caulk	Loose piles from weekend hauling	Loose piles being spread and packed in
2/12/2019 2:20 PM	J Caulk	Loose piles from today	Piles will be spread and packed in
4/15/19 8:45 AM	R Key	Loose piles need to be pushed out and surface area needs to be roll pack and wet down surface area	Will spread and pack loose piles from weekend
4/22/19 9:00 AM	T Parker	Several piles need to be spread from weekend	Piles will be spread and packed in
4/30/19 8:30 AM	R Key	Many piles of by-product needs to be pushed out and whole area needs to be rolled and packed	Truck problem delayed unloading until the weekend. Piles will be spread and packed in
5/6/19 8:15 AM	R Key	Loose piles need to be pushed out and area needs to be worked	Loose piles will be spread and pack
5/14/19 8:30 AM	J Caulk	Loose piles from by-product hauling over weekend	Piles will be spread and packed
7/3/19 8:45 AM	R Key	Loose piles need to be pushed out	Loose piles are from lack of resources due to coal train unloading. Piles will be spread and packed
7/15/19 9:30 AM	T Parker	A lot of piles need to be spread	Start spreading piles immediately
8/12/19 10:30 AM	J Jordan	Loose piles	Starting to spread and pack loose piles
9/9/19 9:30 AM	J Walker	Several piles need to be spread	Will spread today
9/23/19 10:00 AM	T Parker	Few piles need to be spread	Will spread today
9/30/19 11:30 AM	J Walker	Loose piles need to be spread and packed	Will spread today

### **3.0 Citizen CCR Dust Complaint Logging**

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 control of potential dust emissions at the site.