

**Gainesville Regional Utilities
Deerhaven Generating Station**

Coal Combustion Residuals Fugitive Dust Control Annual Report

(October 2020 - September 2021)

Prepared for:

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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 2020 through 30 September 2021.

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., 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., 1/27/2021, 06/13/2021, 8/11/2021, 8/19/2021) 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.

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. Eleven (11) events associated with the presence of unloaded CCRs piles awaiting spreading and compaction were recorded. Visible dust emission from CCR piles 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 all eleven occasions associated with the presence of unloaded CCRs piles, the loose material was

spread and compacted within one week of observation. No dust emissions from the landfill access road were reported during this period.

Table 2-1. Fugitive Dust Emission-Related Events

Date/Time	Inspector	Inspector Notes	Supervisor Notes
12/7/2020 8:05 AM	Christopher Bardet	Some loose piles	Piles will be spread starting tomorrow
12/14/2020 8:32 AM	Christopher Bardet	Some loose piles	Piles will be spread by 12/15/20
12/21/2020 8:00 AM	Christopher Bardet	Some loose piles	Piles will be spread and compacted by 12/21/20
2/1/2021 8:40 AM	Christopher Bardet	Some loose piles	Will be spread this week
3/1/2021 7:30 AM	Joseph Caulk	Loose piles from being hauled over weekend	Piles will be spread today
4/5/2021 8:45 AM	Travis Parker	Loose Piles	Piles will be spread and packed by 4/5/21
6/7/2021 7:30 AM	Kyle Paterson	Spread loose piles	Will spread when dry
6/14/2021 8:30 AM	Kyle Paterson	Piles need to be spread	Will spread and pack starting today
6/28/2021 12:30 PM	Travis Parker	Several piles from the weekend	Will be spread by the end of the day tomorrow
8/30/2021 9:00 AM	Jason Cremeans	Piles need to be spread	Will spread this week
9/27/2021 7:30 AM	Joseph Caulk	Loose piles need to be pushed out.	Will start spreading immediately

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 control of potential dust emissions at the site.