

Smith, Justin L

From: Smith, Justin L
Sent: Tuesday, March 1, 2022 11:52 AM
To: Hillyer, Kirsten
Cc: Huggins, Richard; Behan, Frank; Celeste, Laurel; Embry, Regina G
Subject: RE: Deerhaven - CCR Part A Demonstration, Request for Additional Information

Good morning, Kirsten!

Thank you for reaching out and giving us the chance to provide a status update on the closure of our surface impoundment system. To promote clarity for our responses to the request for additional information (RAI), the following is a timeline of previous communications with EPA on the project:

November 30, 2020 – GRU submitted its “Gainesville Regional Utilities Deerhaven Generating Station CCR Impoundment Closure Initiation Deadline Extension Request” to EPA by email. GRU posted this demonstration to its CCR Rule Compliance Data and Information publicly-accessible internet site, per EPA’s request.

April 12, 2021 – GRU submitted a letter (dated April 9, 2021) updating the status of the previously-submitted demonstration. The letter described GRU’s plan to retrofit its coal-fired boiler so that it could operate on up 100% natural gas and to close the CCR surface impoundment system (comprised of two ponds) by removal of CCR. GRU stated in this letter that it would notify EPA in the event that cessation of placement of CCR and non-CCR wastewaters in the second pond was delayed beyond October 31, 2021.

December 1, 2021 – GRU spoke with and notified EPA of the current status of the closure of surface impoundment system. GRU informed EPA during this phone call of the closure delay (as mentioned in the RAI) due to significant rain events. At the time of and as mentioned during the call, GRU had already ceased operation of the first pond, removed much of the bottom ash accumulated in it, planned to finish removal and decontamination of bottom ash from the first pond by May 2022, and planned to complete removal and decontamination of bottom ash in the second pond (thereby completing closure of the surface impoundment system) by May 2023.

GRU respectfully provides the following in-line responses to EPA’s RAI questions in **bold**, below.

Please reach out to me if there is anything I can clarify or help in providing.

Thank you,

Justin L. Smith, PE
Environmental Permitting and Compliance
Gainesville Regional Utilities
w: 352-393-1266



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From: Hillyer, Kirsten <hillyer.kirsten@epa.gov>
Sent: Monday, February 14, 2022 3:08 PM
To: Smith, Justin L <SmithJL@gru.com>
Cc: Huggins, Richard <Huggins.Richard@epa.gov>; Behan, Frank <Behan.Frank@epa.gov>; Celeste, Laurel <celeste.laurel@epa.gov>
Subject: Deerhaven - CCR Part A Demonstration, Request for Additional Information

Dear Mr. Smith,

On November 29th, EPA contacted GRU to determine whether the date to cease receipt of waste requested in the demonstration submitted pursuant to 40 C.F.R. § 257.103(f)(1) for the Deerhaven Generating Station was met. GRU explained that they were unable to start construction for the new alternative capacity due to unusually wet conditions and therefore fell behind schedule. In light of this and as provided for under 40 C.F.R. § 257.103(f)(3)(ii), EPA is requesting additional information to complete its review of GRU's demonstration for the Deerhaven Generating Station. EPA requests that GRU submit the following:

1. A narrative explaining the progress made and current activities and phase/step at Deerhaven to achieve alternative capacity.

GRU's gas conversion project has allowed GRU to continue to operate its coal-fired boiler without generating CCR (as anticipated and described in the April 12, 2021 letter). GRU has submitted unit heat input data to EPA through EPA's Emissions Collection and Monitoring Plan System demonstrating that GRU has not generated CCR since July 2021. Since CCR has no longer been generated, GRU is not seeking alternative capacity for CCR.

Information on the schedule/timeline of the currently in-progress closure of the surface impoundment system can be found in Attachment A of the updated CCR Surface Impoundment System Closure Plan posted on GRU's publicly-accessible internet site.

2. A discussion of the issues that led to the delay to the requested date to cease receipt of waste.

Precipitation records from Gainesville Regional Airport indicate two intense storm events occurred in April 2021. The first occurred over April 11 - 12 and the next occurred over April 17-19. A review of the liquid elevations of each pond indicate that the second pond (i.e., the pond in operation) was already operating within 1 foot of its maximum operating level on April 8, 2021, prior to the first storm event. To avoid an unsafe operating condition of the second pond, the first pond had to again be utilized to receive plant process waters and stormwater.

3. An updated requested date to cease receipt of waste.

GRU ceased generation and concomitant deposition/receipt of CCR in its surface impoundment system in July 2021. GRU has already commenced closure and ceased operation/receipt of non-CCR waste in its first pond and plans to cease operation/receipt of non-CCR waste in the second pond in October 2022 (as described in the CCR Surface Impoundment System Closure Plan). Once each pond of the surface impoundment system is successively closed by removal and decontamination of CCR, the ponds will be repurposed to exclusively manage non-CCR waste streams as needed for continued operation of the plant.

4. An updated narrative justifying the new date to cease receipt of waste.

October 2022 is the beginning of the "dry" season for the Gainesville area and is the earliest date GRU can safely (i.e., to minimize the risk of exceeding the maximum operating level of the first pond) remove the second pond from service to complete closure of the CCR Surface Impoundment System. Please note that removing one of the

two ponds from service effectively halves the process water storage capacity of the entire zero-discharge plant, which includes power generation units in addition to its coal-fired boiler.

Please post this additional information to the CCR compliance website pursuant to 40 C.F.R. §§ 257.103(f)(1)(ix)(A), 105(i)(14) and 107(i)(14). Please submit this information no later than close of business on March 1, 2022.

If you have any questions, please reach out to me.

Sincerely,

Kirsten Hillyer
Environmental Engineer
U.S. Environmental Protection Agency
Office of Resource Conservation & Recovery (ORCR)
Materials Recovery & Waste Management Division (MRWMD)
NEW Phone: (202) 566-0542