

Corrective Measures to Address Deficiencies Noted in the Coal Combustion Residual Units Annual Inspection Report

(Annual inspection covering the period from January 9, 2016 – December 15, 2016)

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 publically accessible internet site. Table 1 summarizes the efforts taken by GRU to address each of the deficiencies noted in the 2016 annual inspection. Documents which provide additional details on each remedy are attached in a series of appendices; Table 1 shows which of the appendices correspond to each deficiency remedy.

Table 1. Remedies Taken to Address Deficiencies Noted in the 2016 CCR Units Annual Inspection Report

CCR Unit	Location	Previous Condition	Remedy Action	Date of Remedy Completion	Appendices
Surface Impoundment System	Inside Edge of Pavement On Outer Embankment Near Northern Corner of Ash Cell #1	Damaged Pavement	Pavement Repaired	5/2/2017	A
	Eastern Extent of the Top of the External Slope of Ash Cell #2	Animal Burrow	Burrows Inspected, Filled and Packed with Soil	3/2/2017	B
Landfill	Southern End of N-S Stormwater Drainage Ditch Located East of Cell 4	Damaged Stormwater Culvert	Culvert Removed and Replaced	2/1/2017	C
	Northern and Southern Exterior Side Slopes	Animal Burrows	Burrows Filled and Packed with Soil	1/2016	*

* burrows were similar in appearance and location to those identified in the previous annual inspection

APPENDIX A

Work Order	75510 (DH) REPAIR ROAD BY ASH CELL #1		Scheduled Start Date	02/13/2017
Status	COMPLETED		WO Type	CM
Parent Work Order			Class	
Department	CA COAL/ASH		Priority	P3
PM Code			Warranty	N
Cost Code			Safety	N
Problem Code			Equip Criticality	
Reported By	PPMATSUP POWER PLANT MATERIALS SUPERVISOR		Assigned To	CA OPERATOR
Project			Assigned By	PPMATSUP
Standard WO				
Equipment	DFAC-GROUNDS KEEPING (DH)	MOWING, TRIMMING, & GROUNDS KEEPING & ROAD REPAIR		
Location	COMMON FACILITY (DH)	COMMON FACILITY		
Equipment Manufacturer			Estimated Hours	20
Equipment Model				
Equipment Serial Number				
Date Started	04/10/2017		Date Completed	05/02/2017

Equipment User Defined Fields

System	MAINTENANCE
Sub-location 2	COMMON GROUNDS KEEPING

Work Order Comments

FOWLERJN [02/07/2017 15:22]:
 Please repair road way beside Ash Cell #1 as reported in CCR Surface Impoundment Annual Inspection.

WHITERA [04/11/2017 15:19]:
 ON 4/10/2017 STARTED PREPPING FOR ASPHALT.

WHITERA [04/11/2017 15:20]:
 ON 4/11 CONTINUED PREPPING FOR ASPHALT.

WHITERA [04/12/2017 15:07]:
 ON 4/12/2017 CONTINUED PREPPING FOR ASPHALT.

WHITERA [04/13/2017 15:11]:
 ON 4/13/2017 CONTINUED PREPPING FOR ASPHALT.

PARKERTB [04/17/2017 15:05]:
 4/14/2017 FINISHED PREP FOR REPAIR

PARKERTB [04/18/2017 15:15]:
 4/18/2017 PAVED THREE PATCH AREAS BY ASH CELL

FOWLERJN [04/25/2017 12:16]:
 On 4/14/17 bought half a load of asphalt.

Activities

Activity	Trade	Est. Hours	People Req.	Task	Description
10	C/A	20	2		

APPENDIX B

Deerhaven Coal Combustion Residual Annual Inspection Animal Burrow Inspection 2017

Methodology

I visited the Deerhaven site Thursday, March 2, 2017 to inspect all burrows present on the CCR surface impoundment ponds. I inspected these burrows with Gale Fillingier. My investigation consisted of a field visit, followed by an exterior and interior inspection of each burrow/hole and surroundings.

Conclusions

Two holes/burrows were found and inspected, West Slope Ash Cell #1 and North Slope Ash Cell #2. Both were vacant, as evidenced by spider webs and weeds covering the opening of each burrow and the absence of tracks. Internal investigation confirmed vacancy.

These holes were not made by gopher tortoises. I based these findings on the following criteria:

- Size – the holes were roughly 3 to 8” in size, gopher tortoises are typically 10-14” in size and need an opening of that size or larger
- Depth – these holes were 12 to 24” deep and ended, gopher burrows have a depth of 120” (10 feet)
- Shape – these holes were irregular in shape with rough edges, gopher holes are oval in shape with smooth edges. The top of a gopher tortoise burrow is rounded and shaped like their shells.
- Location – these holes were on a fairly sloped Bahia grass surface, gopher tortoise prefer flat sites with gentle slopes. Gopher tortoise frequent longleaf pine ecosystems and are also present in beach dunes. These sites have a food source and small shrubs needed for cover from predators. Gopher tortoises also have a small home range and do not venture far for food. This area is simply not a preferred site for a gopher tortoise. It lacks the necessary food and cover from predators.

These burrows/excavations were likely made by possum or armadillos searching for food (grubs, roots or tubers). The soil was excavated one time in a search for food, and hole abandoned as evidenced by the grass and vegetation growing on the top of the excavated soil. These types of small holes are present in other areas on the Deerhaven site, generally on the edges of mowed roads. The current mowing regime makes this a preferred area for these animals to search and dig for food, and I would expect to see this type of activity continue in the future.

Qualifications

I have a Bachelor of Science in Forestry and 20 years of experience with forest resource management. I have worked with gopher tortoise burrows on logging sites and sandhill restorations, observing both active and inactive gopher burrows/nests. My experience also includes 20 years on the Deerhaven site. I know the forest and wildlife characteristics of this tract.

Joe Wolf, GRU Forester

Joe Wolf

APPENDIX C

Work Order	71045 (DH) INSTALL NEW DRAIN PIPE IN CCR LANDFILL	Scheduled Start Date	12/05/2016
Status	CLOSED	WO Type	CM
Parent Work Order		Class	
Department	CA COAL/ASH	Priority	P3
PM Code		Warranty	N
Cost Code		Safety	N
Problem Code		Equip Criticality	
Reported By	PPMATSUP POWER PLANT MATERIALS SUPERVISOR	Assigned To	CA OPERATOR
Project		Assigned By	PPMATSUP
Standard WO			
Equipment	LANDFILLS (DH) LANDFILLS	Estimated Hours	80
Location			
Equipment Manufacturer			
Equipment Model			
Equipment Serial Number			
Date Started	01/17/2017	Date Completed	02/01/2017

Equipment User Defined Fields

Work Order Comments

FOWLERJN [10/10/2016 15:17]:
INSTALL NEW DRAIN PIPES UNDER THE ACCESS ROAD AT THE CCR ANDFILL.

FOWLERJN [10/10/2016 15:21]:
MR IS BEING WROTE TO PLACE THE ORDER FOR THE UNDER DRAIN PIPE.

WHITERA [01/17/2017 15:20]:
ON 1/17/2017 STARTED EXCAVATING FOR PIPE REPLACEMENT.

PARKERTB [01/18/2017 15:18]:
1/18/17 PREPPED HOLE FOR PIPE INSTALATION

WHITERA [01/23/2017 15:15]:
ON 1/23/2017 INSTALLED NEW CULVERT PIPES AT CCR LANDFILL ENTRANCE ROAD.

WHITERA [01/24/2017 15:15]:
ON 1/24/2017 WORKED ON BACK FILLING AND FIXING ENTRANCE ROAD TO CCR LANDFILL.

FOWLERJN [01/25/2017 15:07]:
Bought Asphalt millings and sand for project.

FOWLERJN [01/27/2017 10:39]:
pLEASE SEE ATTACHED TRENCHING PAPER WORK AND JOB CHECK LIST

Activities

Activity	Trade	Est. Hours	People Req.	Task	Description
10	C/A	80	2		