

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

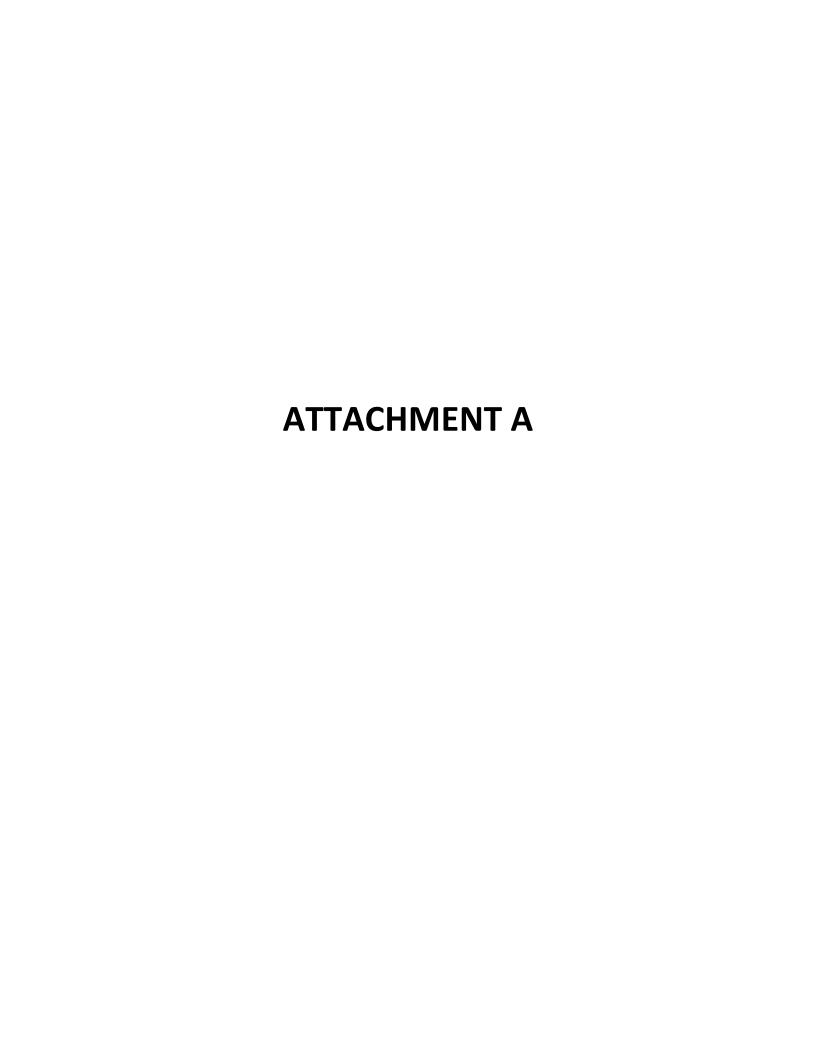
(Annual inspection covering the period from December 16, 2016 – December 12, 2017)

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 publicly accessible internet site. Table 1 summarizes the efforts taken by GRU to address each of the deficiencies noted in the 2017 annual inspection. As available, documents which provide additional detail on the dates and actions taken to address the deficiencies are included in a series of attachments; Table 1 shows which attachment corresponds to each deficiency corrective measure.



Table 1. Remedies Taken to Address Deficiencies Noted in the 2017 CCR Units Annual Inspection Report

| CCD | | Dunitous | | | Date of |
|----------------------------|--|--|--|----------|------------|
| CCR | l a salian | Previous | Dama ada Aatian | A 4.4 In | Remedy |
| Unit | Location | Condition | Remedy Action | Attach. | Completion |
| : System | Western and Northern Internal Corners of Ash Cell #1, Northern Internal Corner of Ash Cell #2 | Erosion and Unarmored Slopes | Erosion repaired, slopes re- armored | A | 3/8/2018 |
| Surface Impoundment System | External Slope of Ash Cell #2, Southwest External Slope of Pump Back #1, Near Light Post on Southeast External Slope Between Pump Back Ponds | Animal Forage Holes (x3) | Holes Inspected, Filled and Packed with Soil | В | 1/5/2018 |
| Surface I | Southern-most Splash Block in Ash Cell #2 | Erosion and Undercutting of Base Layer | Void space filled with flowable concrete | С | 3/7/2018 |
| | Middle Section of Northern Drainage Ditch | Sediment Accumulation | Sediment Removed | D | 3/8/2018 |
| | South Side of Cell 2/Cell 3 Access Ramp | Erosion | Erosion repaired, area regraded for drainage | - | 2/23/2018 |
| Landfill | Western Side of Cell 1 | Improper Surface Drainage Path and Erosion | Erosion repaired, area filled in | - | 2/20/2018 |
| | Southern Section of Cell 4 Basin | Ponding | Area filled in and graded for drainage | - | 5/25/2018 |
| | Southern Exterior Side Slope | Animal Burrows/ Forage Holes (x2) | Holes Inspected, Filled and Packed with Soil | - | 2/16/2018 |



| Infor10 | EAM | Print Short WO Cards | | ıvfor |
|----------------------------|-------------|---|-------------------------|------------|
| Work Order | 87378 (DH) | Ash Cells 1&2 Corners need to be repaired | Scheduled Start Date | 12/22/2017 |
| Status | CLOSED | | WO Type | CM |
| Parent Work Order | | | Class | |
| Department | FAC FACIL | ITIES | Priority | P3 |
| PM Code | | | Warranty | N |
| Cost Code | | | Safety | N |
| Problem Code | | | Equip Criticality | |
| Reported By | PPMATSUP | POWER PLANT MATERIALS SUPERVISOR | Assigned To | FOWLERJN |
| Project | | | Assigned By | SWEATD |
| Standard WO | | | | |
| Equipment | A00040 (DH) | PROCESS WATER PONDS, AL | L | |
| Location | | | | |
| Equipment Manufacturer | | | Estimated Hours | 36 |
| Equipment Model | | | | |
| Equipment Serial Number | | | | |
| Date Started | 01/30/2018 | | Date Completed | 03/08/2018 |
| | | Equipment User Defined Fields | | |

Work Order Comments

FOWLERJN [12/22/2017 10:49]:

The North East and West corners of Ash Cell #1 need to be repaired due to the Vac truck dumping in them. The Northeast corner of Ash Cell #2 needs to be repaired as well for the same reason.

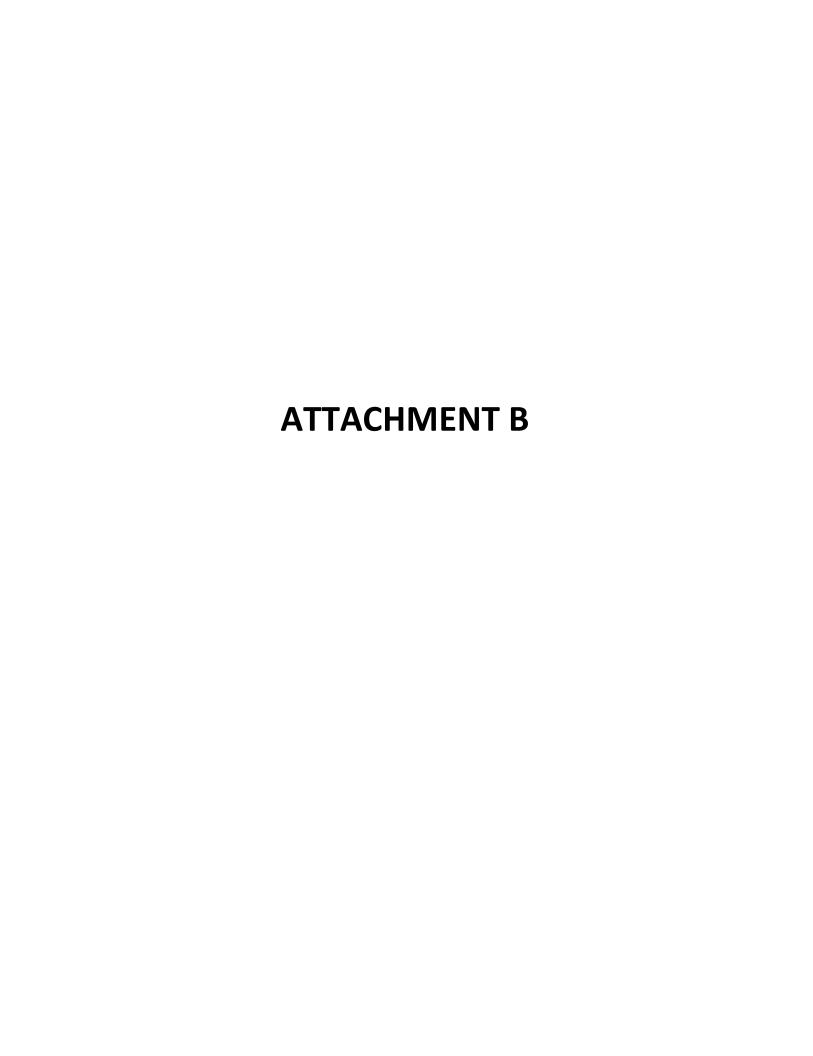
WHITERA [02/01/2018 08:15]:

ON 1/30/2018 ORDERED 3 LOADS OF RIP-RAP TO INSTALL ON BERM IN CORNERS OF ASH CELLS.

WHITERA [02/01/2018 08:14]:

ON 1/30/2018 WORKED ON CORNERS OF ASH CELLS. HAD TO ORDER MORE RIP-RAP.

| | | | | Activities | |
|----------|-------|------------|----------------|------------|-------------|
| Activity | Trade | Est. Hours | People Rea. | Task | Description |
| 10 | C/A | 36 | 1 | | |





Pump Back Pond Weekly Inspection Form

Inspector's Name: Gale Fillinger Date: 1/8/18 Time: 15:25

| Pu | mp Back Pond ID: | | | # 1 | | | | | | |
|----|---|-----|----------|-----|--|-----|----------|--|--|--|
| | Pump Back Pond water elevation (ft NGVD 29): 183.4 | | | | | | | | | |
| Ch | Check the appropriate column (Yes/No) below. Any line item checked as "Yes" should be further explained in the inspector notes section referring to the pump back pond ID and line item number. Any unusual condition should be addressed in the supervisor comments section with notes on the action(s) that will be taken to address the condition. | | | | | | | | | |
| | | Yes | No | | | Yes | No | | | |
| 1 | Is water level above 186 ft NGVD 29? | | \ | 8 | Any visible cracks (transverse, longitudinal, or desiccation) on slopes? | | V | | | |
| 2 | Are there bare patches or un-vegetated areas on slopes? | | > | 9 | Any animal burrows on the side slopes? | | √ | | | |
| 3 | Vegetation height greater than 6 inches on outer slopes? | | > | 10 | Any boils or excessive, turbid, or sediment-laden seepage? | | √ | | | |
| 4 | Shrubs or trees located on armored, inner slopes? | | \ | 11 | Abnormal discoloration/ foaming in water? | | ✓ | | | |
| 5 | Any visible slope erosion (e.g., rills, scarps, sloughing)? | | ✓ | 12 | Are sediments/debris floating in water? | | √ | | | |
| 6 | Any visible slope bulging? | | √ | 13 | Any other unusual condition? | | √ | | | |
| 7 | Any visible depressions in slope or near toe of outside slopes? | | ✓ | | | | | | | |

| Pu | Pump Back Pond ID: # 2 | | | | | | | | | |
|-----|--|--------|----------|-------|--|-----|----------|--|--|--|
| Pu | Pump Back Pond water elevation (ft NGVD 29): 183.4 | | | | | | | | | |
| sec | eck the appropriate column (Yes/No) below. Any tion referring to the pump back pond ID and line nments section with notes on the action(s) that wi | item r | umber. | Any i | unusual condition should be addressed in th | | | | | |
| | | Yes | No | | | Yes | No | | | |
| 1 | Is water level above 186 ft NGVD 29? | | √ | 8 | Any visible cracks (transverse, longitudinal, or desiccation) on slopes? | | √ | | | |
| 2 | Are there bare patches or un-vegetated areas on slopes? | | √ | 9 | Any animal burrows on the side slopes? | | √ | | | |
| 3 | Vegetation height greater than 6 inches on outer slopes? | | ✓ | 10 | Any boils or excessive, turbid, or sediment-laden seepage? | | √ | | | |
| 4 | Shrubs or trees located on armored, inner slopes? | | √ | 11 | Abnormal discoloration/ foaming in water? | | √ | | | |
| 5 | Any visible slope erosion (e.g., rills, scarps, sloughing)? | | √ | 12 | Are sediments/debris floating in water? | | √ | | | |
| 6 | Any visible slope bulging? | | ✓ | 13 | Any other unusual condition? | | √ | | | |
| 7 | Any visible depressions in slope or near toe of outside slopes? | | √ | | | | | | | |



Pump Back Pond Weekly Inspection Form

| | Inspector Notes | Inspector Notes | | | | | | |
|---|-----------------|-----------------|--|--|--|--|--|--|
| Pump Back Pond Name and ID, Line Item # | Note | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Inspector Signature

| Supervisor Comments | | | | | | |
|---|------------------------------------|---------------------------------------|--|--|--|--|
| Pump Back Pond Name and ID, Line Item # | Comment | Estimated Date of Repair/Action | | | | |
| Pond # 1, Item # 9 | Animal hole was filled in 1/5/2018 | | | | | |
| | | | | | | |
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| <u> </u> | | | | | | |

Supervisor Signature



| Infor10 | EAM | Print Short WO Cards | | intoe. |
|--------------------------|-------------|--|--------------------------|------------|
| Work Order | 87373 (DH) | Ash Cell 2 south Crookneck Undermining | Scheduled Start Date | 12/22/2017 |
| Status | CLOSED | | WO Type | CM |
| Parent Work Order | | | Class | |
| Department | FAC FACIL | ITIES | Priority | P3 |
| PM Code | | | Warranty | N |
| Cost Code | | | Safety | N |
| Problem Code | | | Equip Criticality | |
| Reported By | PPMATSUP | POWER PLANT MATERIALS SUPERVISOR | Assigned To | BOGGSSP |
| Project | | | Assigned By | SWEATD |
| Standard WO Equipment | A00040 (DH) | PROCESS WATER PONDS, AL | .L | |

Location

Equipment Manufacturer Equipment Model

Equipment Serial

Number

Date Started Date Completed 03/07/2018

Equipment User Defined Fields

Estimated Hours 36

Work Order Comments

FOWLERJN [12/22/2017 10:47]:

The South Crookneck on Ash Cell #2 has a hole in the asphalt on the west side of it. The Crookneck looks to be undermined by the water coming off the asphalt road. Please look into this and fill the hole with material.

| Activities Activities Activities | | | | | | | |
|----------------------------------|-------|------------|----------------|------|-------------|--|--|
| Activity | Trade | Est. Hours | People Req. | Task | Description | | |
| 10 | FAC | 36 | 1 | | | | |



| Infor10 | EAM | | Print Short WO Cards | | ıvfor | |
|---------------------------------|--------------|------------------------|----------------------|-------------------------|-------------|--|
| Work Order | 89830 (DH) | Excavate Fly Ash Canal | | Scheduled Start Date | 02/19/2018 | |
| Status | CLOSED | | | WO Type | CM | |
| Parent Work Order | | | | Class | | |
| Department | CA COAL/A | ASH | | Priority | P3 | |
| PM Code | | | | Warranty | N | |
| Cost Code | | | | Safety | N | |
| Problem Code | | | | Equip Criticality | | |
| Reported By | PPMATSUP | POWER PLANT MATE | RIALS SUPERVISOR | Assigned To | CA OPERATOR | |
| Project | | | | Assigned By | PPMATSUP | |
| Standard WO | | | | | | |
| Equipment | LANDFILLS (I | DH) | LANDFILLS | | | |
| Location Equipment Manufacturer | | | | Estimated Hours | 80 | |
| Equipment Model | | | | | | |
| Equipment Serial Number | | | | | | |
| Date Started | 02/19/2018 | | | Date Completed | 03/08/2018 | |
| Equipment User Defined Fields | | | | | | |

Work Order Comments

FOWLERJN [02/15/2018 09:13]:

The Fly Ash Canal needs to excavated and cleaned out. Accumulated sediment has been identified in the annual inspection and weekly inspections of the CCR landfill

WHITERA [02/20/2018 15:20]:

ON 2/19/2018 AND 2/20/2018 WORKED ON DREDGING FLYASH CANAL.

KEYRD [02/23/2018 07:46]:

ON 02/21/18-02/23/18 FACILITIES WORKED ON DIGGING OUT CANAL AND CLEANING EQUIPMENT

| | | | | Activities | |
|----------|-------|------------|----------------|------------|-------------|
| Activity | Trade | Est. Hours | People Reg. | Task | Description |
| 10 | C/A | 80 | 2 | | |