

**Gainesville Regional Utilities
Deerhaven Generating Station**

Coal Combustion Residuals Fugitive Dust Control Annual Report

(October 2019 - September 2020)

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 2019 through 30 September 2020.

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., 02/06/2020, 03/13/2020, 04/16/2020, and 07/22/2020) 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. Thirteen (13) 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 ten (10) of the 13 occasions associated with the presence of unloaded CCRs piles, the loose material was spread and compacted within one week of observation. For three (3) consecutive

weeks, it appears that the piles could not be spread as the D6 bulldozer required repairs. On one occasion, dust emissions from the landfill access road were reported; the supervisor note suggests that the road was wetted as needed to control dust emission.

Table 2-1. Fugitive Dust Emission-Related Events

Date/Time	Inspector	Inspector Notes	Supervisor Notes
10/7/2019 9:00 AM	Josh Walker	Loose piles need to be pushed out.	Piles will be spread today and packed.
10/14/2019 9:00 AM	Josh Walker	Loose piles need to be pushed out.	Will be spread today and packed.
11/4/2019 10:00 AM	Richie White	Loose piles from weekend.	Will be spread today.
11/12/2019 10:00 AM	Richie White	Loose piles from weekend.	Will be spread starting today.
11/18/2019 10:00 AM	Richie White	Loose piles from weekend.	Will be spread and packed today.
1/20/2020 12:00 PM	Travis Parker	Several piles need to be spread from weekend hauling.	Piles were spread and packed.
2/24/2020 10:00 AM	Ronald Key	Some loose piles on landfill need to be pushed out and landfill could use some water on top.	Loose piles will be spread, packed and wet
2/24/2020 10:00 AM	Ronald Key	Access onto landfill needs to be wet down.	Access road will be wet as needed
5/11/2020 9:00 AM	Travis Parker	Several piles to be spread due to D-6 being down.	will spread when D-6 fixed.
5/25/2020 10:00 AM	Travis Parker	Several piles need to be spread.	waiting on repairs to D-6.
6/1/2020 9:00 AM	Beckman	Piles of materials need to be spread and packed as soon as D-6 dozer is available.	The D-6 dozer should be up and running later this week. Will spread and pack as soon as D-6 is available.
6/8/2020 9:30 AM	Travis Parker	Several piles need to be spread due to D-6 being down	New ETA on D-6 is 6/10/20 will spread as soon as it is complete.
6/22/2020 8:30 AM	Joseph Caulk	Some piles from over the weekend need to be spread.	Spreading in progress-will continue.
7/6/2020 9:42 AM	Calvin Curls/ Richie White	Few loose piles at top.	Will spread tomorrow.

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.