



REPORT

**2024 Annual Inspection Report for
CCR Surface Impoundment**

*Plant Smith Ash Pond
Southport, Florida*

Submitted to:

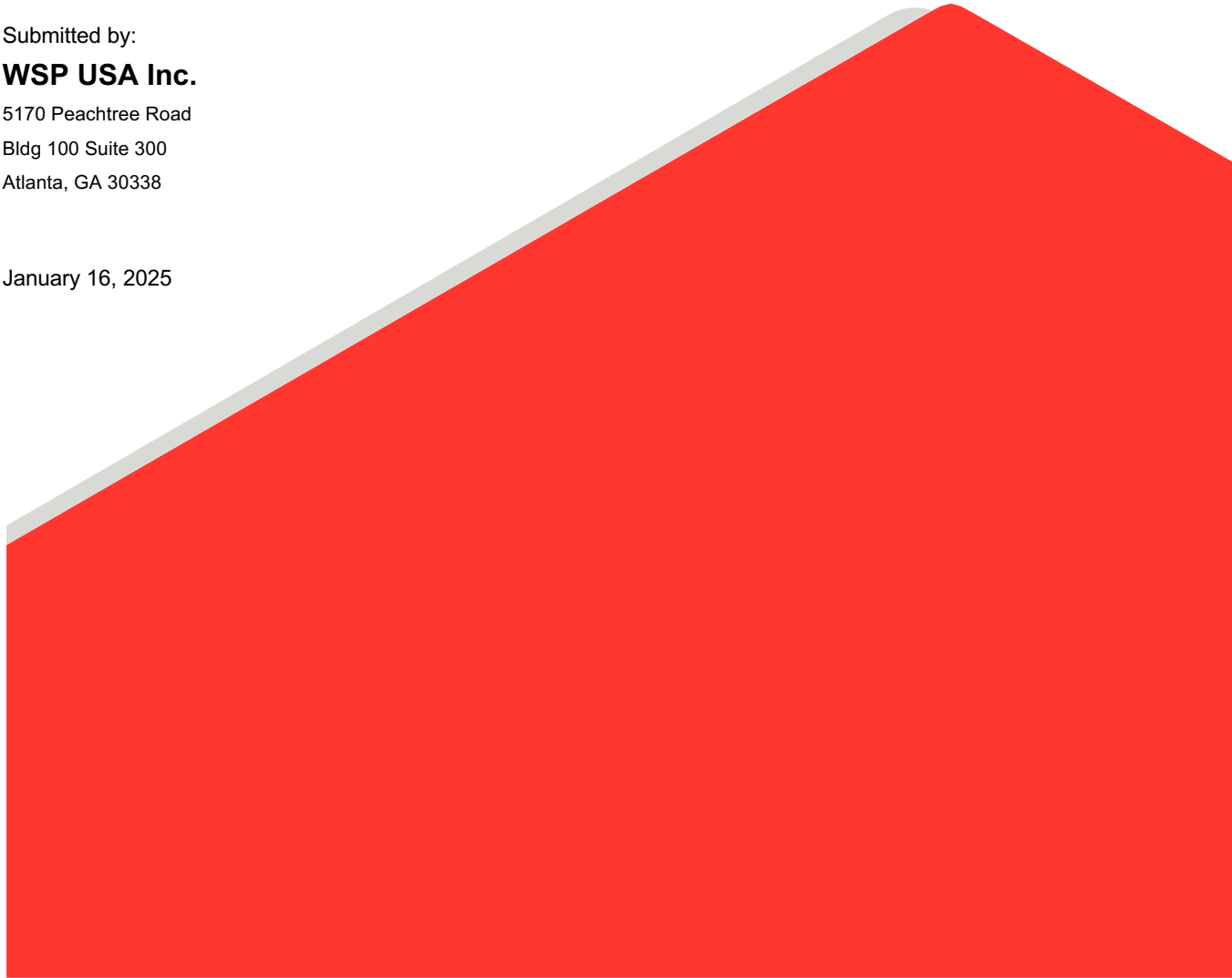
Florida Power & Light Company

Submitted by:

WSP USA Inc.

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January 16, 2025



Distribution List

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INTRODUCTION

WSP USA Inc. performed the annual inspection for a coal combustion residuals (CCR) surface impoundment at the Plant Smith Ash Pond, located in Southport, Florida. This facility is owned and operated by Florida Power & Light Company (FPL). The inspection, conducted on November 21, 2024, and this report are intended to meet the requirements of 40 Code of Federal Regulations (CFR) §257.83(b). WSP's inspection was performed by Kevin S. Brown, PE.

The Plant Smith Ash Pond is currently being closed in place by dewatering the CCR and consolidating the CCR into a dry stack in accordance with 40 CFR 257.102(d) and no longer receives CCR. Closure is approximately 95% complete and will ultimately result in the transformation of the impoundment to a landfill through moisture conditioning, placement and compaction of CCR (See Figure 1).

REVIEW OF AVAILABLE INFORMATION – §257.83(b)(1)(i)

In accordance with §257.83(b)(1)(i), WSP reviewed available information regarding the status and conditions of the Plant Smith Ash Pond. The documents reviewed included:

- Closure Plan (Rev. 01) – Plant Smith Ash Pond
- Structural Stability Assessment (Rev. 01) – Plant Smith Ash Pond
- Safety Factor Assessment (Rev. 01) – Plant Smith Ash Pond
- Hazard Potential Classification (Rev. 01) – Plant Smith Ash Pond
- Inflow Design Flood Control System Plan (2021) – Plant Smith Ash Pond
- History of Construction (2021) – Plant Smith Ash Pond
- Report of Annual Inspection 2023 – Plant Smith Ash Pond

In addition, Kevin Brown from WSP visited the Smith facility on a bi-weekly basis throughout the year and performed periodic inspections of the facility and construction progress. These visits also included routine discussions with site personnel regarding any concerns with weekly inspections that were addressed as needed. In general, any observed concerns were typically involving construction and temporary conditions resulting from construction and were addressed by the contractor accordingly.

INSPECTION SUMMARY – §257.83(b)(1)(ii) AND §257.83(b)(1)(iii)

WSP conducted a visual inspection of the Plant Smith Ash Pond on November 21, 2024. The inspection evaluated the geometry and conditions of the impoundment, exterior slopes, erosion and vegetative conditions, stormwater management controls, placement of coal combustion residuals (CCR), slope stability, and any other signs of distress or malfunction.

CHANGES IN GEOMETRY – §257.83(b)(2)(i)

As of November 2024, CCR from the remaining areas of the eastern part of the former ash pond (designated as a stormwater management pond for the closure system) has been removed as part of closure activities and the stormwater management pond construction was completed (See Figure 1). In prior inspection reports, the south dike and portions of the and east dike have been reported as removed. The former eastern dike has been excavated and regraded in accordance with the closure plan and the detention pond construction was completed in mid-2024.

In addition, the final closure area elevation remains at 73 ft. mean sea level (MSL, NAVD) due to closure construction. This elevation is anticipated to be the maximum elevation of the dewatered, placed and compacted CCR.



Figure 1: Aerial Image of Plant Smith Impoundment dated December 6, 2024

INSTRUMENTATION – §257.83(b)(2)(ii)

There is currently no instrumentation equipment installed at Plant Smith impoundment. As such, there are no recorded readings of instruments since the previous annual inspection.

APPROXIMATE WATER AND CCR VOLUME– §257.83(b)(2)(iii)

CCR previously contained within the limits of the three stormwater ponds (two lined ponds and one unlined pond) was excavated and relocated to the consolidated closure area prior to the inspection. No water was impounded within the final closure area during the inspection. The two lined ponds are designed to receive plant process and stormwater from the plant facility and will not contain CCR. The unlined pond receives stormwater from the final closure area and discharge from the perimeter toe drain system.

The only non-stormwater impounded during the inspection was within the lined pore water pond used by the contractor to temporarily store water prior to treatment (see Figure 1). The approximate minimum and maximum depths of impounded water within this pond as of the previous annual inspection, as well as the present depth of impounded water as of November 21, 2024, are presented in Table 1 below. Water depths and elevations are estimated from weekly level measurements and confirmed during the 2024 inspection.

Table 1: Impounded Water at Plant Smith Impoundment – 2024 (Temporary Pore Water Pond Only)

Minimum Depth:	< 1'
Minimum Elevation (MSL – NAVD):	11 ft-MSL
Maximum Depth:	5'
Maximum Elevation:	16 ft-MSL
Present Depth (at inspection):	3.8'
Present Elevation (at inspection):	13.8 ft-MSL

The approximate minimum and maximum depths of CCR as of the previous annual inspection, as well as the present depth of impounded CCR as of November 21, 2024, are presented in Table 2 below. Elevation and depth of CCR includes the area where CCR is being actively placed and compacted per the approved closure plan. WSP has used a bottom elevation of CCR in the closure area of elevation 5 ft-MSL based on historical photos and records.

Table 2: Impounded CCR at Plant Smith Impoundment – 2023 (Final Closure Area Only)

Minimum Depth:	0'
Minimum Elevation:	3.5'
Maximum Depth:	68' (placed and compacted CCR)
Maximum Elevation:	73' (top of placed and compacted CCR)
Present Depth:	68' (placed and compacted CCR)
Present Elevation:	73' (top of placed and compacted CCR)

STORAGE CAPACITY– §257.83(b)(2)(iv)

The impoundment capacity of the Plant Smith impoundment at the time of the inspection is estimated to be approximately 807,900 cubic yards. This volume is the sum of the capacities of the three ponds located south of the final closure area and the temporary lined pond as shown on Figure 1. Note that 802,000 cubic yards of this capacity is not used for CCR impoundment as the three ponds located south of the closure area are designated for stormwater management. These ponds could be used for impoundment of CCR in an unlikely emergency affecting the final closure area during construction. Depths, elevations, and storage capacity are estimates derived by qualified personnel from available information and do not include the area where CCR is being placed and

compacted per the approved closure plan, e.g., the storage capacity does not include dewatered, placed and compacted CCR.

The small lined temporary pond is used by the closure contractor for management of pore water from closure activities. This pond is located west of the primary impoundment and has capacity for 5,900 cubic yards for CCR and will be decommissioned upon completion of closure.

APPROXIMATE CCR AND WATER VOLUME – §257.83(b)(2)(v)

The volume of materials in the Plant Smith impoundment at the time of the inspection is estimated to be less than 3,000 cubic yards of impounded water (in the existing temporary pore water pond designated on Figure 1) and less than 25,000 cubic yards of impounded CCR in the north berm (northwest corner), which remains to be relocated to the final closure area. Impounded volumes do not include stormwater in the three ponds south of the closure area or CCR placed and compacted in the final closure area. The total volume CCR within the limits of the Plant Smith Ash Pond is approximately 3.9 million cubic yards. This includes CCR that is being dewatered, placed and compacted per the approved closure plan.

STRUCTURAL WEAKNESS AND DISRUPTING CONDITIONS – §257.83(b)(2)(vi)

No indications of actual or potential structural weakness were noted during the November 21, 2024 inspection or during the review of available information.

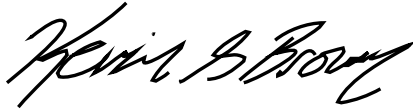
CHANGES AFFECTING STABILITY OR OPERATIONS – §257.83(b)(2)(vii)

The site is currently undergoing closure construction that involves consolidating the CCR footprint to a smaller area. Construction completed since the last inspection has included complete removal of the CCR from the unlined pond area and significant amount of CCR removed from the northern berm reconstruction area. Process water from plant operations is currently stored within a lined pond in the west area of the site where CCR was previously removed. All three stormwater ponds located south of the closure area are now completed. These ponds can serve as emergency containment of contact water and CCR stockpiles during ongoing construction.

Remaining construction should be completed in 2025 and will include restoration of the north berm, completion of the slurry wall and completion of final capping of the CCR placed in the closure area. All berms constructed from CCR during plan operations have now been removed and have either been replaced or are being replaced with structural fill, which improves site stability.

CERTIFICATION

Based on the review of the available information noted above and of the observations and results of the annual inspection, it is my professional opinion that this report has been completed in accordance with 40 CFR 257.83(b).

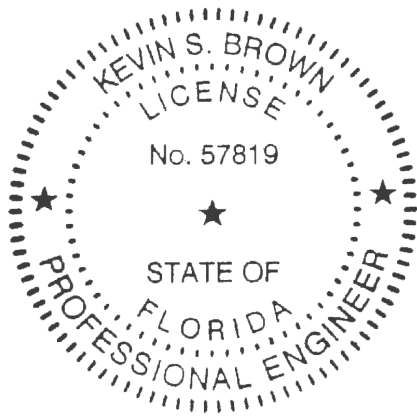


01/16/25

Kevin S. Brown, PE
Director, Civil Engineer
Florida Professional Engineer No. 57819

Date

KSB/LS/lS



This item has been digitally signed and sealed by Kevin Brown on the date adjacent to the seal. Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies



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