



DRAFT REPORT

2024 Initial Annual Inspection Report for CCR Legacy Surface Impoundment

*Plant Scholz Closed Ash Pond
Sneads, Florida*

Submitted to:

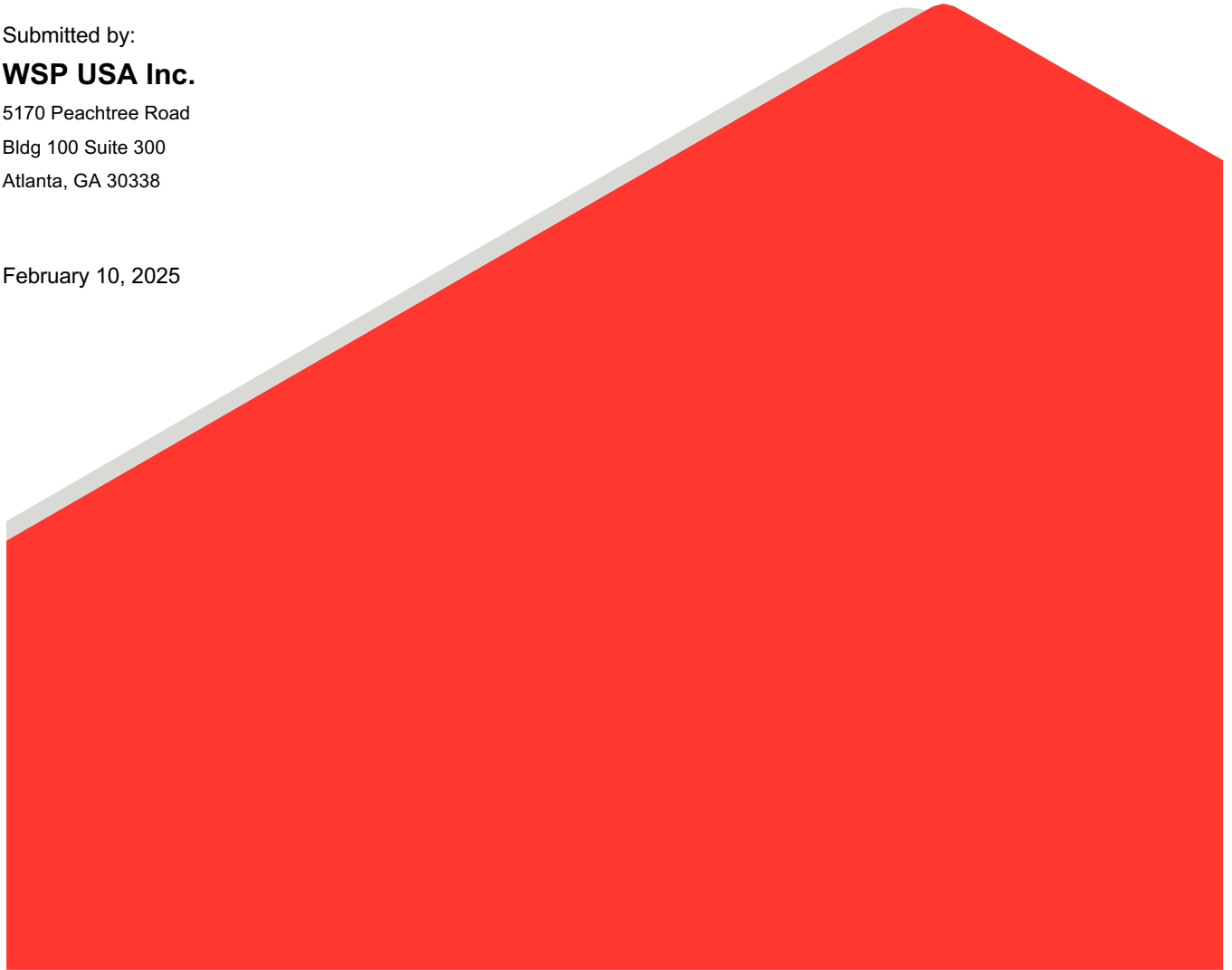
Florida Power & Light Company

Submitted by:

WSP USA Inc.

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February 10, 2025



Distribution List

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WSP USA Inc.

INTRODUCTION

WSP USA Inc. performed the initial annual inspection for a coal combustion residuals (CCR) surface impoundment (Ash Pond)¹ at Plant Scholz, located in Sneads, Florida. This facility is owned and operated by Florida Power & Light Company (FPL). The inspection, conducted on November 22, 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 Scholz Closed Ash Pond is classified as a legacy impoundment in accordance with 40 CFR Part 257, Subpart D, as it is a surface impoundment that no longer receives CCR but contained both CCR and liquids on or after October 19, 2015 and is located at an inactive electric utility. The former Ash Pond is subject to a closure plan based on legal proceedings that resulted in a Settlement Agreement filed on June 24, 2015 in the U.S. District Court for the Northern District of Florida (Case: 4:14-cv-00268-MW-CAS). Following the Settlement Agreement, the former Ash Pond underwent closure construction between 2017 and the end of 2024. The requirements of the closure plan have been met and the Plant Scholz Closed Ash Pond is currently undergoing post-closure care.

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

The initial annual inspection is required to be completed prior to February 10, 2025. Many of the reports required by the rule, including inflow design flood control system, history of construction, hazard potential classification and structural stability and safety factor assessment are not required until 2026; therefore, these reports were not available for review as part of this initial inspection. In accordance with §257.83(b)(1)(i), WSP reviewed available information regarding the status and conditions of the Plant Scholz Ash Pond. The documents reviewed included:

- Closure Plan and associated design calculations – Plant Scholz Ash Pond (prepared by WSP)
- Report of Annual Inspection 2023 – Plant Scholz Ash Pond (not previously submitted for regulatory purposes)
- Weekly inspection reports for the facility which commenced in November 2024.

WSP representatives also made periodic visits to the Plant Scholz Ash Pond throughout 2024 during implementation of the closure plan. These visits include site reconnaissance and consultations with site personnel regarding condition of the Plant Scholz Ash Pond and construction progress.

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

WSP conducted a visual inspection of the Plant Scholz Ash Pond on November 22, 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)

Figure 1 is an aerial image of the facility as of February 14, 2018. This image provides the status of the Plant Scholz Ash Pond prior to modifications associated with the closure plan. The closure plan basically includes dewatering, excavating and relocating CCR from the southern portion of the Plant Scholz Ash Pond to the northern portion of

¹ The ash pond closure was not completed until December 2024; therefore, the name "Closed Ash Pond" will be used for regulatory purposes following this initial Annual Inspection Report.

the Plant Scholz Ash Pond as shown in Figure 1. There is a lined industrial water treatment pond that was constructed prior to the date of the aerial survey that was used for water treatment during closure construction.



Figure 1 – February 14, 2018 Aerial Image

As of November 2024, CCR formerly contained in the southern portion of the Plant Scholz Ash Pond has been dewatered, excavated, relocated, placed and compacted to the northern end of the pond in accordance with the closure plan. The closure plan includes a toe drain system along the eastern and southern boundaries of the final closure area to manage water levels at the toe of the slopes.

Figure 2 provides an overview of the Plant Scholz Ash Pond based on an aerial survey dated November 27, 2024. Prior to commencement of construction for closure, a subsurface barrier wall consisting of native soil and bentonite with a maximum permeability of 1×10^{-7} cm/s hydraulic conductivity was constructed north of the Plant Scholz Ash Pond. The barrier wall was keyed into a natural marl formation for a depth of at least two feet. As part of closure, the former southern dike has been lowered by approximately 15 feet and the former CCR storage area has been

repurposed as a stormwater detention pond following removal of CCR. Furthermore, a soil buttress has been constructed along the southern and eastern boundaries as shown on Figure 2 for the purposes of stabilizing the CCR slopes.

As shown in both Figure 1 and 2, there is also a lined industrial wastewater treatment pond (IWTP) located in the former coal storage area located east of the Plant Scholz Ash Pond. The IWTP is lined with an HDPE liner and receives water pumped from the toe drain system along the southern and eastern boundaries of the former Plant Scholz Ash Pond. The IWTP discharges through a 28-inch diameter HDPE pipe via gravity discharge and the outflow is monitored prior to discharging offsite.



Figure 2: Aerial Image of Plant Scholz Impoundment dated November 27, 2024

INSTRUMENTATION – §257.83(b)(2)(ii)

There is currently no permanent instrumentation equipment installed at the Plant Scholz Ash Pond.

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

CCR previously contained within the limits of the stormwater pond was dewatered, excavated and relocated to the consolidated closure area prior to the inspection. No free water was impounded within the final closure area during the inspection. Stormwater was impounded in the stormwater pond, but the volume of this water is not reported as it only contains stormwater runoff from the closed areas of the Plant Scholz Ash Pond. The lined IWTP contained approximately 8,770 cubic yards of water storage at the time of inspection.

Because this report provides information on the initial annual inspection, approximate minimum and maximum depths of impounded water within the IWTP as of the previous annual inspection are not included. The approximate present depth and elevation of impounded water as of November 22, 2024, within the IWTP is presented in Table 1 below.

Table 1: Impounded Water at Plant Scholz IWTP – 2024

Minimum Depth:	N/A
Minimum Elevation (MSL – NAVD):	N/A
Maximum Depth:	N/A
Maximum Elevation:	N/A
Present Depth (at inspection):	3.5' (average)
Present Elevation (at inspection):	102 ft-MSL (Approximate)

Similar to impounded water, the approximate minimum and maximum depths of CCR as of the previous annual inspection are not included given this is the initial annual inspection. The present depth and elevation of CCR includes the area where CCR was dewatered, excavated, placed, and compacted per the closure plan. WSP has used a bottom elevation of CCR in the final closure area estimated from the 1956 United States Geological Survey (USGS). Note that the present depth and elevation will not change because CCR relocation has been completed and the pond is inactive.

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

Minimum Depth:	N/A
Minimum Elevation:	N/A
Maximum Depth:	N/A
Maximum Elevation:	N/A
Present Depth:	71.3' (maximum, placed and compacted CCR)
Present Elevation:	176 ft-MSL (top of placed and compacted CCR)

STORAGE CAPACITY– §257.83(b)(2)(iv)

The impoundment capacity of the former Plant Scholz Ash Pond at the time of the inspection is estimated to be approximately 1,373,200 cubic yards. This volume includes the estimated volume of placed and compacted soil and CCR within the final closure area (1,310,000 cubic yards of consumed/unavailable storage) as well as the volume available storage south of the final closure area but contained within the south berm to an elevation of 84 ft-MSL (63,200 cubic yards). This available storage volume is within the stormwater pond area as shown on Figure 3. Depths, elevations, and storage capacity are estimates derived by qualified personnel from available information and are based on historical contours beneath the CCR impoundment from 1956.

The lined IWTP is used to store water from the toe drain along the southern and eastern boundaries. The IWTP is located east of the primary impoundment and has capacity for 23,300 cubic yards of water storage to within one foot of the top of the berm.

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

The volume of CCR and soils within the final closure area at the time of the inspection is approximately 1,373,200 cubic yards as shown on Figure 3. This volume does include soil buttress material for the south and eastern slopes, which was placed and compacted from clean structural fill, but lies beneath the final cover system. Estimates for soil volume for the east and south buttress are preliminary pending a final as-built survey for the site and total approximately 320,000 cubic yards. Thus, the approximate volume of CCR within the consolidated ash and capped area is 1,053,200 cubic yards.

The lined IWTP contains water from rainfall and water from the toe drain system installed at the toe of the CCR excavation slopes on the east and southern boundaries. The approximate amount of water stored in this pond at the time of inspection was 8,770 cubic yards. This volume is based on an estimated depth at the time of the inspection; this depth was not measured.

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

No indications of actual or potential structural weakness were noted during the November 22, 2024 inspection or during the review of available information.

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

Construction in accordance with the approved closure plan was essentially complete at the time of inspection. Improvements by implementing the closure plan that affect stability of the facility include construction of the buttresses on the southern and eastern slopes (Figure 2), relocating CCR from the southern portion of the Plant Scholz Ash Pond (Figure 1) and reducing the height of the southern dike which no longer impounds CCR. All of these changes are permanent changes based on the approved closure plan and result in improved stability and containment of the CCR in the impoundment.

CERTIFICATION

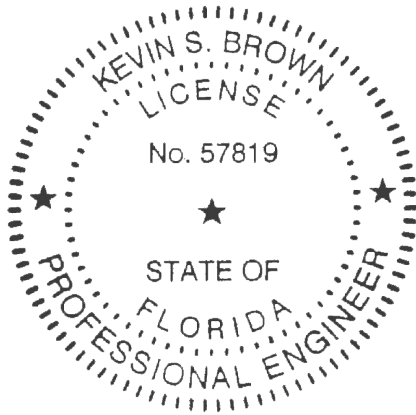
Based on the review of the available information noted above and of the observations and results of the annual inspection, it is my professional opinion that this report has been completed in accordance with 40 CFR §257.83(b).



02/10/25

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

Date



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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