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REPORT

CCR Fugitive Dust Control Plan

Gulf Clean Energy Center Landfill #2

Submitted to:

Florida Power & Light Company

Submitted by:

Golder Associates USA Inc. – Member of WSP

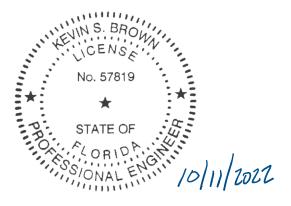
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October 11, 2022

Certification Statement

Based upon my knowledge, information, and belief that the content in this Fugitive Dust Control Plan is accurate, I hereby certify that this Fugitive Dust Control Plan satisfies the requirements of the United States Environmental Protection Agency's (US EPA) "Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" Final Rule 40 C.F.R 257.80(b)(1) through 40 C.F.R 257.80(b)(7).



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Revision Summary

Date	Revision No.	Comments / Notes
October 11, 2022	Rev. 0	Issued for Operating Record

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1.0 PURPOSE

The purpose of this Fugitive Dust Control Plan is to identify measures that may be taken to minimize Coal Combustion Residuals (CCR) from becoming airborne at the Gulf Clean Energy Center (GCEC) Ash Landfill #2, and to log any citizen complaints in accordance with requirements in 40 C.F.R § 257.80(b)(1) through (7) of the CCR Final Rule.

2.0 SCOPE

This Fugitive Dust Plan identifies and describes the CCR fugitive dust control measures that GCEC may use to minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from the CCR Landfill #2, roads, and other CCR management and material handling activities. CCRs are generated from the burning of coal to produce electricity and are defined as fly ash, bottom ash, boiler slag, and flue gas desulfurization (FGC) materials. Note that CCR is no longer generated at the GCEC, as the plant has been converted for natural gas use. CCR handling activities consist of reclamation of CCR for beneficial use and occasional re-grading of previously placed CCR to maintain slopes and appropriate grades for surface water management.

3.0 **REFERENCES**

Closure Plan – Revision 01 for Gulf Clean Energy Center – Ash Landfill #2, 40 C.F.R Section 257.102(b), October 2021

Post-Closure Care Plan – Revision 01 for Gulf Clean Energy Center – Ash Landfill #2, 40 C.F.R Section 257.104, October 2021

4.0 GENERAL INFORMATION

The US EPA defines "fugitive dust" as solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than though a stack or chimney (§257.53).

5.0 REQUIREMENTS OF §257.80(b)

This section outlines the requirements of the CCR Fugitive Dust Control Plan as specified in paragraphs (b)(1) through (7) of §257.80. Florida Power & Light must operate the facility in accordance with this plan.

CCR Landfill #2 (subject of this plan) is located at GCEC. Additional CCR Units located at GCEC are the CCR Landfill #1, and the Gypsum Storage Area (GSA).

A water suppression truck is used to wet the roads in the immediate vicinity of CCR Landfill #1, CCR Landfill #2, and the nearby Gypsum Storage Area (GSA); the water suppression truck will also be used when reclaiming CCR for beneficial reuse. Fugitive emissions at GCEC are also regulated under the facility's Title V Air Permit.

These dust control measures were implemented based on the site-specific conditions of GCEC and are determined to be applicable and appropriate for the CCR units. The evaluation of the conditions included

assessing the effectiveness of the fugitive dust control measures for each CCR unit at the facility over time taking into consideration various factors such as site conditions, weather conditions, and operating conditions.

In order to minimize CCR from becoming airborne on roads and during CCR material handling activities, water suppression trucks are used on site roads. Trucks carrying CCR are covered or enclosed. Additionally, speed limits are posted to reduce vehicle speeds on all roads.

The effectiveness of the fugitive dust control measures is continuously assessed by routine plant Inspections of Watch (IOW) conducted by facility personnel. Annual awareness training is conducted to ensure all facility personnel timely report any fugitive dust issues to the facility's Environmental Compliance Personnel. Any fugitive dust issue will be addressed appropriately.

All citizen complaints received by GCEC or Florida Power & Light are forwarded to the FPL Environmental Services department for coordination and action. Each complaint will be logged and investigated by the facility's Environmental Compliance Personnel and FPL Environmental Services department.

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