



2025 Annual Inspection Report for CCR Surface Impoundment

Plant Smith Closed Ash Pond

Southport, FL

January 16, 2026

Annual CCR Inspection performed by
Florida Power and Light
PGD Civil Fleet Team

Introduction

On November 5, 2025, an inspection of Plant Smith Closed Ash Pond Coal Combustion Residual (CCR) Surface Impoundment was performed in Southport, FL. The inspection was performed in accordance with and to meet the requirements of 40 Code of Federal Regulations (CFR) §257.83(b). The inspection was performed by the Florida Power and Light (FPL) Civil Fleet Team (CFT) which is a part of the Engineering and Operations Support and Services group within the Power Generation Division (PGD). The CFT provides civil engineering support for FPL's generating fleet. The inspection was performed by Rachel Mudd Garrett, PE (FL License Number 74170).

The Plant Smith Closed Ash was closed according to 40 CFR §257.102 (d), with notification of closure completion occurring August 30, 2025. The requirements of the closure plan were met and the Plant Smith Closed Ash Pond is now in post-closure care.

Review of Historical Information §257.83 (b) (1) (i)

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

- Notification of Closure Completion (August 2025) – Plant Smith Closed Ash Pond
- Closure Plan (Rev. 02 – January 2024) – Plant Smith Closed Ash Pond
- Structural Stability Assessment (Rev. 01 October 2021) – Plant Smith Ash Pond
- Safety Factor Assessment (Rev. 01 October 2021) – Plant Smith Ash Pond
- Hazard Potential Classification (Rev. 01 October 2021) – Plant Smith Ash Pond
- Inflow Design Flood Control System Plan (2021 October 2021) Plant Smith Ash Pond
- Report of Annual Inspection 2024 (January 2025) – Plant Smith Closed Ash Pond
- As Built Closure drawings (June 2025) – Plant Smith Closed Ash Pond
- Weekly inspection logs by site personnel
- Discussions with plant personnel prior to the annual inspection

Inspection Summary – §257.83 (b) (1) (ii) and §257.83 (b) (1) (iii)

FPL conducted a visual inspection of the Plant Smith Closed Ash Pond on November 5, 2025. The inspection evaluated the conditions of the impoundment, exterior slopes, interior slopes and construction areas, stormwater management controls to identify any signs of distress or malfunction as applicable. The visual inspection also included hydraulic structures underlying the external stormwater basin of the CCR unit for structural integrity and continued safe and reliable operation.

Changes in Geometry – §257.83 (b) (2) (i)

Since the previous initial inspection, some minor changes in geometry were noted. At the time of the previous inspection, closure activities were nearly complete with the exception of the north canal. At the time of the 2025 annual inspection, all closure activities were completed and the pond was operating in post-closure care.

Instrumentation – §257.83 (b) (2) (ii)

No instrumentation equipment is currently in place, and none has been added since the previous initial inspection. Because of this, no instrumentation readings were available to review.

Approximate Water and CCR Depths and Elevations – §257.83 (b) (2) (iii)

The historical ash pond impoundment boundaries include the area of the three stormwater ponds which are located to the south of the Dry Ash Stack. Of these three stormwater ponds, two are lined and one is unlined. The two lined ponds receive stormwater runoff from the closed dry ash stack and plant process water. The unlined pond receives stormwater from the closed dry ash stack as well as discharge from the perimeter toe drain system. These stormwater ponds were not included as impounded CCR water in the water calculation as they only contain stormwater and do not contain CCR.

The approximate minimum and maximum elevations were provided on the as built closure plans (maximum elevations) as well as the historical borings (minimum elevations). To calculate maximum depth, the assumed average bottom elevation of 5 feet NAVD of CCR was used as previously provided by the engineer of record. The minimum and maximum depths and elevations of the dry CCR stack are presented below. These are the present values and will not change during post-closure care.

Minimum Depth: 0 feet

Minimum Elevation: 3.5 feet NAVD

Maximum Depth: 71.6 feet

Maximum Elevation: 76.6 feet NAVD

Storage Capacity – §257.83 (b) (2) (iv)

Since the previous inspection, the only change to storage capacity is the reduction of the temporary pore water pond previously mentioned. All available storage is assumed to be within the three stormwater ponds associated with the structure. As previously reported, this capacity is approximately 802,000 cubic yards.

Approximate Water and CCR Volumes – §257.83 (b) (2) (v)

Impounded water volumes do not include the stormwater in the three ponds south of the closure area. There is approximately zero cubic yards of impounded CCR water stored in the post-closure condition of the Plant Smith Closed Ash Pond.

The total volume of CCR stored within the Plant Smith Closed Ash Pond is approximately 3.9 million cubic yards as estimated by the engineer of record during closure. Exact volumes are difficult to estimate, as soil and CCR were excavated and placed in the final stack.

Structural Weakness or Disrupting conditions – §257.83 (b) (2) (vi)

At the time of the inspection, no actual or potential structural weaknesses were noted. No existing conditions that might disrupt or have the potential to disrupt safety or the post-closure operation of the CCR Unit and appurtenant structures was noted.

Other Changes – §257.83 (b) (2) (vii)

As previously noted, closure of the Ash Pond was completed in 2025. With the exception of the final construction, no other changes are noted. No changes were noted that might have affected the stability or operation of the impounding structure since the previous initial inspection.

Certification

Based on the review of the above information along with a visual site inspection on November 6, 2025, it is my opinion that this annual inspection report has been completed in accordance with 40 CFR 257.83(b).

Rachel Mudd Garrett

1/16/2026

Rachel Mudd Garrett, PE
Manager, Civil Engineering Fleet Team
FL PE License No. 74170

Date



This item has been digitally signed and sealed by Rachel Mudd Garrett, PE on the date adjacent to the seal.
Signature must be verified on any electronic copies.