

CLOSURE PLAN – REVISION 01
40 C.F.R. SECTION 257.102(b)
PLANT SMITH ASH POND
FLORIDA POWER & LIGHT COMPANY

This Closure Plan was prepared for Florida Power & Light Company's (FPL's) Smith Electric Generating Plant (Plant Smith) Ash Pond, located in Southport, Florida. This Closure Plan was prepared in accordance with the United States Environmental Protection Agency's (EPA) "Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" Final Rule (40 C.F.R. Part 257, Subpart D) and meets the requirements of 40 C.F.R. §257.102(b) for closure of CCR surface impoundments.

The Plant Smith Ash Pond is currently being consolidated and closed in place in accordance with 40 C.F.R. §257.102(d) and no longer receives CCR.

Facility details are as follows:

Site Name / Address

Plant Smith
4300 Highway 2300
Southport, FL 32409

Owner Name / Address

Florida Power & Light Company
700 Universe Boulevard, JES/JB
Juno Beach, FL 33408

CCR Unit

Plant Smith Ash Pond

Closure Method

Closure in Place

CLOSURE PLAN

The purpose of this Closure Plan is to outline the methods and procedures underway to close the Plant Smith Ash Pond consistent with recognized and generally accepted good engineering practices. A Notice of Intent to Initiate Closure was completed for the Plant Smith Ash Pond on May 7, 2021. The Plant Smith Ash Pond will undergo closure consolidating the CCR footprint and closing the CCR unit in place in accordance with 40 C.F.R. §257.102(d). This Closure Plan may be amended in accordance with the requirements of 40 C.F.R. §257.102(b)(3) should there be a change in operation or unanticipated events that would substantially affect the written Closure Plan.

Methods and Procedures

The Plant Smith Ash Pond is currently being consolidated and closed in place. CCR in the Southwest (SW) and East ash pond areas will be relocated to the northwest portion of the unit, creating a consolidated footprint. During consolidation, the pond is being dewatered, to provide a stable base for the construction of a containment

berm for the consolidated footprint and to excavate ash outside the consolidated footprint area. CCR will be excavated from the area outside the consolidated footprint, transported, and disposed of in the consolidated area.

Once CCR consolidation is completed and final grade has been achieved, final cover designed to minimize infiltration of liquids into the waste and potential releases of CCR from the unit will be installed. Closure will be conducted in a manner that minimizes the need for further maintenance and controls, and, to the maximum extent feasible, to protect human health and the environment. This will be accomplished by providing sufficient grades and slopes to:

- Preclude the probability of future impoundment of water, sediment, or slurry
- Ensure slope and cover system stability
- Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.
- Be designed so that the need for further controls is minimized while protection of human health and the environment is maximized.

CCR Material Estimate

The final closed configuration of the ash pond will contain approximately 4,200,000 cubic yards of CCR consolidated and closed in place. This estimate is based on an evaluation of historical grades for the bottom of the impoundment. The actual volume will vary based on the actual bottom of the impoundment. The estimated volume includes one foot of over-excavation below the bottom of the CCR.

Final Cover

The final cover system was designed in accordance with 40 C.F.R. §257.102(d)(3)(ii) to minimize maintenance after closure of the CCR unit. The final cover system was designed to prevent the future impoundment of water and includes measures to prevent infiltration and sloughing and to minimize erosion from wind, water and settling. The largest area requiring a final cover is approximately 53 acres, following consolidation and closure in place.

The engineered final cover system consists of the following minimum components, listed from top to bottom

- Specified final cover infill as outlined in final closure plan design: 1/2" minimum sand infill to be used on the majority of the closure and 3/4" minimum HydroBinder® infill to be used on down drains
- Engineered Synthetic Turf (ClosureTurf®)
- 40 or 50 mil minimum low density polyethylene geomembrane liner. 50-mil Supergripnet liner is placed on slopes 3H:1V while the shallower slopes are capped with a 40-mil Microspike liner

The final cover system, consisting of engineered synthetic turf with run-on and run-off controls, meets the closure standards of 40 C.F.R. §257.102(d)(3)(i).

SCHEDULE

Closure activities for the Plant Smith Ash Pond are outlined in the schedule presented in Table 1. Closure milestones and activities are approximate and some of the activities will overlap.

Table 1: Plant Smith Ash Pond Closure Milestones Schedule

Closure Activity	Plant Smith Ash Pond
Closure Regulatory Interface and Permitting	Q1 2016
Begin Dewatering Activities	Q4 2017
Pre-closure Activities for Lined Wastewater Pond and Piping Systems (Subgrade Grading, Preparation, and CCR Consolidation)	4.5 years: Q1 2017 – Q2 2021
Redirection of Plant Stormwater and Process Water	April 2021
Notice of Intent to Close	May 2021
Closure Construction (CCR Consolidation, Stormwater Management, and Final Cover Installation)	2.5 Years: Q2 2021 – Q4 2023
End Final Closure Construction Activities	2023

CERTIFICATION

I certify that this Closure Plan for the Plant Smith Ash Pond was prepared in accordance with 40 C.F.R. §257.102(b).

Kevin S. Brown, P.E.
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