



**GENON WESTLAND ASH STORAGE SITE
DICKERSON, MARYLAND
2019 ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

To: Walter Johnson, GenOn MD Ash Management LLC

From: Jeffrey Hutchins, P.E., AECOM

Date: December 12, 2019

RE: Annual CCR Fugitive Dust Control Report
Westland Ash Storage Site Operating Cell B

1.0 Introduction

As of April 17, 2015, the Westland Ash Storage Site (Westland site) Cell B has been regulated by the Code of Federal Regulations (CFR) under 40 CFR §257 Subpart D – Standards for Disposal of Coal Combustion Residuals (CCR) in Landfills and Surface Impoundments. Section §257.80 required GenOn to prepare a CCR Fugitive Dust Control Plan and place it into GenOn’s operating record by October 19, 2015. Section §257.80(c) requires GenOn to prepare an annual CCR Fugitive Dust Control Report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The first annual report was completed and placed in GenOn’s operating record by December 19, 2016 – as required by the regulations – 14 months after placing the Initial CCR Fugitive Dust Control Plan in the facility’s operating record. Subsequent Annual Reports are required to be completed and placed in GenOn’s operating record one year after the date of completing the previous report. This 2019 Annual Report will be completed and placed in the GenOn operating record by December 19, 2019.

2.0 Summary of Current CCR Fugitive Dust Control Measures

The Westland site has historically received and stored CCRs produced at GenOn’s Dickerson Generating Station. CCR transferred to the Westland site has been offloaded and stored in the currently operational area of Cell B. During the period from December 1, 2018 to December 1, 2019, GenOn has begun a new phase of work at the site (“deconstruction phase”) where the existing CCR material in the active and uncapped portion of Cell B (Cell B-1A) is being excavated, loaded, and hauled offsite to a CCR processing plant for recycling (beneficial reuse). All of the deconstruction work at the Westland site and hauling of the CCR material is being undertaken by a third-party vendor to GenOn that excavates and transports the CCR material from the Westland site to a cement plant in Union Bridge, Maryland. As part of these activities, GenOn has fully implemented the measures described in the Initial CCR Fugitive Dust Control Plan to control all sources of CCR fugitive dust.

GenOn has not received any citizen input or complaints during this reporting period, and thus no corrective measures have been required to be implemented.

GenOn Dickerson Generating Station

During the 2019 reporting period, 10,302 cubic yards of CCR material were shipped from the Dickerson Generating Station to the Westland site where it was either placed in lifts or loaded onto third-party trucks for hauling to the cement plant in Union Bridge. At the

Dickerson Generation Station, all CCR material is conditioned with water before loading and leaving the station. CCR material loaded at Westland site destined for beneficial reuse retains 20- to 26-percent moisture per sampling completed prior to commencing CCR excavation for beneficial reuse.

- Fly ash generated at the generating station is stored in large diameter concrete silos, and then is released and mixed with water until the GenOn operator determines that the ash has the appropriate moisture content to be transported to the Westland site. The ash is then loaded into dump trucks for hauling to the Westland site.

Transportation of CCRs to the Westland Ash Site

CCRs are transported from GenOn's Dickerson Generating Stations by means of dump trucks that are fully enclosed on all four sides and have been completely covered with a firmly secured tarp system to prevent loss of CCR and to minimize dust emissions during transportation.

- Before leaving the generating station, vehicles transporting CCRs are inspected by the transporter and cleaned of any excess material or debris that could blow off, fall off, or spill during transportation. The transporter maintains an inspection log in the truck for 30 days for each of these inspections per COMAR 26.04.10.
- Trucks are washed at the plant's truck washing station to control tracking of CCRs onto plant roads and onto public roads.
- Truck speeds are limited to 15 mph on site haul roads.
- When the CCR haul trucks arrive at the Westland site, they are routed to the active deconstruction area in Cell B. Haul roads are posted with a maximum speed limit of 15 mph as a safety measure and to minimize the generation of dust. CCRs are deposited in the active deconstruction area under the direction of a site operator also serving as a spotter.
- Trucks are washed with clean water inside of Cell B at the site's wash station prior to leaving the Westland site. Water at the wash station is provided by the site's groundwater well.

Deconstruction Operations

The active CCR deconstruction working areas are routinely watered by GenOn's dedicated mobile water truck for dust suppression. The water truck is permanently on site and refills from the onsite Pond 2 (for storage of non-contact stormwater). In the deconstruction area, existing CCR material is excavated and loaded into dump trucks that are fully enclosed on all four sides and have been completely covered with a firmly secured tarp system to prevent loss of CCR material and to minimize dust emissions during transportation.

Drivers adhere to COMAR 26.04.10, completing visual inspections, removing ash from the outside of the truck that could fall or blow off during transportation, and recording each trip in a log kept in the truck for 30 days. If needed, drivers can also wash CCR materials from tires or other areas of their trucks at the site's wash station inside the active CCR area.

Road Watering

During hauling operations, tracking of CCRs onto the site access roads is controlled at all times to prevent transport of CCRs beyond the active area of Cell B by periodic washing of trucks and equipment, and scraping material from tires and equipment tracks. GenOn currently controls the presence of CCRs, dust, and mud on the paved and unpaved access roads by frequent wetting of the roads by way of the site's dedicated mobile water truck.

- Water trucks apply water at regular intervals during CCR transportation operations (both incoming and outgoing loads), beginning at the start of each day's activities and at routine intervals thereafter.
- Paved areas and access roads are visually inspected on a daily basis during CCR transportation operations to determine the presence of CCRs, sediment, and dust. All CCRs and sediment material are routinely removed and disposed of back into Cell B, and roads receive water from the dedicated water truck to minimize dust generation.
- Unpaved areas that carry vehicle traffic are visually inspected on a daily basis during CCR transportation operations, and receive water to reduce dust. CCRs and excess sediment are removed and disposed of back into Cell B.

3.0 Citizen Input

The Site Supervisor maintains a formal log dedicated to citizen input and complaints regarding fugitive dust emissions from the Westland site and public roads leading to the site. This form was included as part of the Initial CCR Fugitive Dust Control Plan. During the reporting period from December 1, 2018 to December 1, 2019, there were no citizen complaints or input provided by citizens recorded by the Site Supervisor. As a result, no corrective measures were required to be implemented.

4.0 Summary

During the reporting period from December 1, 2018 to December 1, 2019, GenOn implemented the measures presented in the Initial CCR Fugitive Dust control Plan to control fugitive CCR dust from the active portion of Cell B at the Westland site and from the transport of CCRs from the Dickerson Generating Station to the Westland site or outbound loads to the beneficial reuse facility. During the reporting period, there were no citizen complaints or input recorded by the Site Supervisor and no corrective measures were required.

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