



**GENON WESTLAND ASH STORAGE SITE
DICKERSON, MARYLAND
2022 ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

To: Jay Spence, GenOn MD Ash Management LLC (GenOn)
From: Tom White, P.E., AECOM Technical Services, Inc. (AECOM)
Date: December 15, 2022
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 2022 Annual Report will be completed and placed in the GenOn operating record by December 19, 2022.

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, which was decommissioned on June 1, 2020. 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, 2021 to December 1, 2022, no CCR material was offloaded and stored at the Westland Site, but the “deconstruction phase” or mining of CCR material continued in 2022 in the uncapped portion of Cell B, primarily on the plateau of Cell B. The deconstruction phase of Cell B includes the excavation, loading, and hauling offsite of CCR material to a processing plant for recycling / beneficial use. All of the deconstruction work at the Westland Site is being undertaken by MERG/PBCo, which has a contract with GenOn for the removal of the ash, through its contractor Hetzer, Inc.. The CCR material is hauled to a cement plant in Union Bridge, Maryland for beneficial reuse. 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 for fugitive dust emissions, and thus no corrective measures have been required to be implemented.

GenOn Dickerson Generating Station

During the 2022 reporting period, no CCR material was transported from the Dickerson Generating Station to the Westland Site for offloading and storing.

Cell B Deconstruction Operations

During the period from December 1, 2021 to December 1, 2022, 188,407 tons of CCR material were mined from the Westland Site and transported to the beneficial reuse facility in Union Bridge, MD. A portion of the northeast section of Cell B has been mined completely down to the cell's clay base liner as part of Cell B Deconstruction Plan Phase 1. GenOn and MERG/PBCo, subsequently received approval from the Maryland Department of the Environment (MDE) and Montgomery County Department of Permitting Services (DPS) for Phases 2 through 5 of the Cell B Deconstruction Plan, which are focused on the mining of the Cell B uncapped plateau. As of this Report, mining operations are in Phase 4 of the Deconstruction Plan. GenOn is also currently pursuing MDE and DPS approval for Deconstruction Plan Phases 6 through 8, which will include removal of the geosynthetic cap and mining of the northern and western slopes of Cell B below the plateau.

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 either the onsite Pond 2 (for storage of non-contact stormwater) or a pond on the Dickerson Generating Station property. 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, returning the ash to Cell B, 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.

The third-party mining contractor continued deconstruction activities in 2022, except during outages at the cement plant. During periods of inactivity, the third-party mining contractor or GenOn's operations and maintenance (O&M) contractor will apply an industry standard crusting agent to the surface of the exposed CCR in the mined area to control dust while they are not at the site.

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 GenOn 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, 2021 to December 1, 2022, there was only one citizen complaint received related to a truck back-up-alarm heard early in the morning on the public road outside the Westland Site; however, there were no citizen complaints for fugitive dust emissions received 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, 2021 to December 1, 2022, GenOn implemented the measures presented in the Initial CCR Fugitive Dust control Plan to control fugitive CCR dust from the deconstruction operations in Cell B. During the reporting period, there were no citizen complaints or input related to fugitive dust emissions received by the GenOn site supervisor and no corrective measures were required.

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