



Fugitive Dust Control Report

To: Andy Carter (NRG Indian River Generating Station)
From: Richard Southorn, PE, PG, CPSWQ
Re: Indian River Landfill – Fugitive Dust Control Report
Memo Date: December 16, 2018

Introduction

APTIM Environmental and Infrastructure, Inc. (APTIM) is providing this report memorandum (Report) to document our findings regarding dust control practices followed by Indian River Power LLC (Indian River, a subsidiary of NRG Energy, Inc. [NRG]) for the Indian River Landfill (Landfill) located in Dagsboro, Delaware.

This Report has been prepared to comply with the requirements as specified in the *Disposal of Coal Combustion Residuals from Electric Utilities Final Rule* (CCR Rule) 40 CFR §257 and §261. This report must be placed in the Indian River facility's operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the publicly accessible internet site per §257.107(g)(2).

Regulations

CCR regulations set forth within §257.80 provide guidelines for fugitive dust control measures to ensure that regulated CCR units are designed to minimize CCR from becoming airborne at the facility. An annual report must be developed that discusses the effectiveness of these measures.

Specifically, §257.80 stipulates:

§257.80: "(c) The owner or operator of a CCR unit must 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 initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by §257.105(g)(2)."

This report must be placed within the Facility Operating Record. §257.105(g) of 40 CFR Part §257 provides record keeping requirements to ensure that this report will be placed in the facility's operating record. Specifically, §257.105(g) stipulates:

§257.105(g): (g) Operating criteria. The owner or operator of a CCR unit subject to this subpart must place the following information, as it becomes available, in the facility's operating record: (2) The annual CCR fugitive dust control report required by §257.80(c)."

§257.106(g) of 40 CFR Part §257 provides guidelines for the notification of the availability of the initial and periodic plan. Specifically, §257.106(g) stipulates:

§257.106(g): (g) Operating criteria. The owner or operator of a CCR unit subject to this subpart must notify the State Director and/or appropriate Tribal authority when information has been placed in the operating record and on the owner or operator's publicly accessible internet site. The owner or operator must: (2) Provide notification of the availability of the annual CCR fugitive dust control report specified under §257.105(g)(2)."

§257.107(g) of 40 CFR Part §257 provides publicly accessible Internet site requirements to ensure that this Plan is accessible through the Indian River Power webpage. Specifically, §257.107(g) stipulates:

§257.107(g): (g) Operating criteria. The owner or operator of a CCR unit subject to this subpart must place the following information on the owner or operator's CCR Web site: (2) The annual CCR fugitive dust control report specified under §257.105(g)(2)."

Review of Fugitive Dust Control Measures

A Fugitive Dust Control Plan (Plan) was implemented at the facility in 2015. This Plan was developed to meet fugitive dust control standards specified by the CCR Rule, and includes the following information:

- Fugitive Dust Control Practices and Procedures
- Procedures for Citizen Complaints
- Procedures for Plan Assessments and Amendments.

The Plan was last updated in November 2017 by Richard Southorn, PE, PG (APTIM) and Andrew Carter (NRG). The purpose of the review was to ensure that the plan adequately characterizes fugitive dust control procedures implemented at the site, that regulatory objectives are achieved through these procedures, and to provide appropriate modifications for improved fugitive dust control, if appropriate.

The Plan was reviewed by Richard Southorn, PE, PG in October 2018. The plan and associated fugitive dust control measures were deemed appropriate with no further modifications necessary to meet CCR Rule objectives. The measures described in the plan are followed as part of routine operations. This Plan is posted in the facility's operating record.

Facility Inspection with Respect to Dust Control

Richard Southorn, PE, PG (APTIM Environmental and Infrastructure, Inc.) conducted a site inspection on October 16, 2018. During this inspection, documents within the operating record were reviewed to ensure compliance with the CCR Rule. Specific findings regarding fugitive dust control include the following:

1. The Fugitive Dust Control Plan is located in the facility's operating record.
2. Visible Emissions Inspection Reports have been completed appropriately. Corrective Actions have not been necessary due to appropriate dust control management.
3. One citizen complaint was made to the Delaware Department of Natural Resources and Environmental Control on August 1, 2018 regarding dust in the vicinity of landfill. This

complaint was evaluated and determined not to be associated with the landfill or its operations.

The site inspection included a tour of the landfill, including the active area, closed areas, perimeter roads, and sediment basins. Dusty areas were not present. No fugitive dust emissions were observed at the time of the visit. A water truck was observed on-site. All observed areas of the landfill appeared to be operated appropriately.

Summary of Citizen Complaints and Corrective Measures

Routine dust control measures have been completed in accordance with the Fugitive Dust Control Plan. No corrective measures have been found to be necessary based on routine monitoring. Based on a site inspection, all dust control measures appear to be appropriate.

As previously stated, one citizen complaint was made on August 1, 2018. Landfill conditions and operations were reviewed at the time of the complaint. A determination was made that fugitive dust was not emanating from the landfill at or before the complaint and that the complaint was not attributed to landfill operations.

Summary

Fugitive dust control measures are being followed at the facility in accordance with the Fugitive Dust Control Plan. This Plan was last reviewed in October 2018 and found to meet regulatory requirements. This report will be placed in the operating record and uploaded to the Indian River Power CCR compliance reporting website upon the review and approval by Indian River Power. The State Director will be notified upon placement of this Plan in the Facility Operating Record. This Landfill does not have a Tribal authority.



[Handwritten Signature]
12/16/2018