



## MEMORANDUM

**DATE:** December 18, 2017

**TO:** **Joe Hossley, PE**  
Environmental Manager  
NRG Energy Services  
Plum Point Energy Station

**FROM:** **Jason J Ghidotti, PE**   
FTN Associates, Ltd.

**SUBJECT:** 2017 Annual Inspection of CCR Dust Control System for PPES CCR Landfill  
FTN No. 14590-1493-001

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FTN Associates, Ltd. (FTN) has been contracted by Plum Point Services Company, LLC (PPSC) to prepare the 2017 annual Coal Combustion Residue (CCR) fugitive dust control report for the Plum Point Energy Station (PPES) CCR Landfill (Landfill) located in Osceola, AR. This technical memorandum provides a summary of the assessment of the PPES plant fugitive dust control system from November 2016 to December 2017 and findings from an inspection by FTN on December 14, 2017.

In accordance with §257.80(c), the purpose of the report is to provide a summary of the:

1. Actions taken by the Owner or Operator to control CCR fugitive dust,
2. Citizen complaints regarding fugitive dust, and
3. Any corrective measures taken during the reporting period.

The PPES facility has a fugitive dust control plan (FTN, October 2015) that provides information on potential sources of dust; fugitive dust control measures; methods for inspection, monitoring, and recordkeeping; and, periodic assessment of the plan. A copy of the plan is kept in the office of the PPES Environmental Manager and the offices of the PPES CCR management company, Charah.

### **Fugitive Dust Control Measures**

NRG Energy Services (NRG), the power plant and Charah manage fugitive dust at the PPES power plant and the Landfill in accordance with the CCR Fugitive Dust Control Plan (FTN, October 2015). These measures include:

1. Adhering to the speed limit posted on the haul road from the CCR loading station at the plant to the active disposal area.
2. Using adequate water to blend into the CCR materials in the pug mill to minimize fugitive dust during truck loading operations, but not too much to create excess free liquids.
3. Using a street sweeper with water spraying capability on the paved portion of the haul road at least once per shift. The frequency of sweeping/wetting activities is increased (drier conditions) or decreased (rain or snow) depending on the weather.
4. Applying water on the gravel portion of the haul road. Water is applied at a sufficient rate to control dust, but not to create excessive runoff. Water is applied more frequently in drier or windy conditions.
5. Cleaning out haul truck beds in the active disposal area on an as-needed basis to remove materials left in the truck bed.
6. Wetting ancillary gravel roads not used to haul ash material on an as-needed basis.
7. Wetting CCR material in the active disposal area if the material becomes too dry before grading of the waste.

Charah inspects the CCR loading area and the haul road at least twice daily and keeps records of the sweeping and wetting operations. Copies of the records are included in Attachment 1. In addition, Charah performs the weekly inspection of the Landfill, which includes assessing the condition of the CCR disposal and grading operations. Copies of these inspections during the reporting period are included in Attachment 2.

An inspection by FTN on December 14, 2017 along with an interview of the Landfill Manger confirmed usage of the fugitive dust control measures listed above. Attachment 3 provides photos of the landfill taken during the inspection.

### **Citizen Complaints During the Reporting Period**

There were no citizen complaints about fugitive dust from the PPES plant or the Landfill during the reporting period.

### **Corrective Measures Taken During the Reporting Period**

There were no corrective measures implemented by NRG or Charah during the reporting period.

cc: Jim Anderson, Charah PPES Landfill Manager

*Joe*

