

ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared for:



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New Castle Generating Station
West Pittsburg, Pennsylvania

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List of Acronyms & Abbreviations

Annual Report	Annual Fugitive Dust Control Report
CCR	Coal Combustion Residuals
EMIS	Environmental Management Information System
GenOn	GenOn Holdings, Inc.
mph	miles per hour
Plan	Fugitive Dust Control Plan
Rule	Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule

1.0 Introduction

On December 19, 2014, the administrator of the U.S. Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015 and became effective on October 19, 2015. The Rule establishes a comprehensive set of requirements for the disposal of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include compliance with location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action, and closure and post-closure care aspects. The operating criteria include air criteria specified in Title 40 of the Code of Federal Regulations, §257.80, to address the potential pollution caused by windblown dust from CCR units.

The New Castle Generating Station, operated by New Castle Power, LLC, a subsidiary of GenOn Holdings, Inc. (GenOn), is a coal-fired power plant (now firing on natural gas) located in West Pittsburg, Pennsylvania. The Rule applies to this facility due to the management of CCR that was formerly generated from the combustion of coal. Following the successful “closure by removal” [in accordance with §257.102(c)] of the North Bottom Ash Pond in late-2018/early 2019, only the New Castle Plant Ash Landfill remains as a designated CCR unit.

According to the Rule, owners or operators of CCR units must adopt measures that will effectively minimize CCR from becoming airborne at the facility by developing and operating in accordance with a Fugitive Dust Control Plan (Plan) with adequate dust control measures. In this regard, a Plan was prepared to comply with the requirements as specified in §257.80(b)(1-7) of the Rule and placed in the New Castle facility’s operating record on October 19, 2015 per §257.105(g)(1). As required, the Plan was also noticed to the State Director per §257.106(g)(1) and posted to the publicly accessible internet site per §257.107(g)(1).

In addition to the above and per §257.80(c), an Annual Fugitive Dust Control Report (Annual Report) must be completed that includes the following:

- Description of actions taken to control CCR fugitive dust
- Record of all citizen complaints
- Summary of any corrective actions taken

The initial Annual Report must be completed no later than 14 months after placing the Plan in the facility’s operating record, and subsequent Annual Reports completed every 12 months thereafter. This document represents the fourth Annual Report for the New Castle Station and will also be

appropriately placed in the 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).

2.0 Actions Taken to Control CCR Fugitive Dust

As detailed in the Plan and reiterated below, the station has established procedures and inspection requirements which are implemented to minimize/eliminate airborne emissions from the potential fugitive dust sources. The results from inspections conducted and associated observations made during CCR handling activities are documented on logs maintained by the station's Environmental Specialist, including those logs specific to the one-year period (December 2018 to November 2019) relevant to this fourth Annual Report.

As acknowledged in the initial Annual Report and reiterated in the recently amended Plan (Rev. 01, November 2019), the New Castle station added natural gas as a firing source for the boilers and effectively transitioned away from burning coal on June 1, 2016, although this capability is retained. As such, there is no longer routine generation and management of CCR materials, and additions of CCR materials to the Ash Landfill have essentially ceased. Future, cleaning, maintenance, and/or decommissioning of certain equipment items may generate incidental amounts of CCR and non-CCR materials, which would be taken to the Ash Landfill.

2.1 Fly Ash Handling

With the transition to natural gas based operations, fly ash is no longer generated at the station.

2.2 North Bottom Ash Pond Closure

As previously noted, the North Bottom Ash Pond was successfully cleaned and closed in accordance with 257.102(c) of the Rule, as its purpose for the management of bottom ash materials was no longer needed. The "closure by removal" activities were certified by a registered professional engineer, and documented in a June 2019 report that was posted to GenOn's publicly accessible CCR website [per §257.102(f)(3)]. With the removal of the CCR materials and the no-longer applicable designation as a CCR unit, the North Bottom Ash Pond has been eliminated as a potentially contributing source of fugitive dust emissions.

2.3 Transport Roadways

Road surfaces leading to the New Castle Plant Ash Landfill are watered to reduce fugitive dust emissions. The amount of time dedicated to watering the roads is a function of the dryness of the surface and is determined through daily observations by station personnel. The amount of water applied varies seasonally. Fugitive dust emissions are further controlled by posting and maintaining a maximum vehicle speed limit of 10 miles per hour (mph) on unpaved roadways within the boundaries of the station property. The routine transportation of CCR to the Ash Landfill has been discontinued with the addition and use of natural gas.

2.3.1 Monitoring/Recordkeeping

The facility maintains a log of all reported fugitive emissions that deviate from the permitted opacity standards. The facility also maintains a dust suppression log that includes the date and time of water application, the weather condition, the gallons of water applied and the area where water was applied. The completed logs are forwarded to the station's Environmental Specialist and retained for at least five years.

2.4 New Castle Plant Ash Landfill

Fugitive dust is minimized at the Ash Landfill by spreading and compacting the materials with a bulldozer as soon as practical after being delivered (i.e., the freshly dumped materials are not left on the landfill surface for extended periods of time). Additionally, a water truck regularly circulates to spread water on the internal roadways and is able to service the open operating areas of the disposal site. Vehicle traffic operating within the disposal site is restricted to a 10 mph speed limit on unpaved roadways. The routine transportation of CCR materials to the Ash Landfill has been discontinued with the addition and use of natural gas.

2.4.1 Monitoring/Recordkeeping

The facility maintains a log of all reported fugitive emissions that deviate from the opacity limitations set forth in the Title V Operating Permit, the cause of the deviation and the corrective action taken to abate the situation. The facility also maintains a dust suppression log that includes the date and time of water application, the weather condition, the gallons of water applied and the area where water was applied. The completed logs are forwarded to the station's Environmental Specialist and retained for at least five years.

3.0 Record of Citizen Complaints

Per the Rule, the Annual Report must include a record of all citizen complaints that were received by the New Castle Station with regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of receipt, the station's Environmental Specialist enters the citizen complaint into the station's Environmental Management Information System (EMIS) database. The EMIS database then automatically forwards notice of the complaint to the station General Manager and GenOn's corporate Environmental Department. Following initial evaluation of the complaint, New Castle Station then conducts a thorough investigation to confirm the reported incident/conditions and implement corrective actions as may be warranted.

No complaints were registered during this Annual Report's period of record covering December 2018 through November 2019.

4.0 Summary of Corrective Actions Taken

For the December 2018 to November 2019 period of record, and based on continued monitoring and inspections as outlined in Section 2.0, the currently established control measures remain effective in minimizing potential fugitive dust emissions. Moreover, this assertion is further validated by the lack of citizen complaints logged over this same period. Accordingly, no corrective actions were undertaken during the past year, either as a result of internally identified deficiencies or from resolution of citizen complaints.