

ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared for:

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Cheswick Generating Station
Springdale, 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
mph	miles per hour
PADEP	Pennsylvania Department of Environmental Protection
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 Cheswick Generating Station, owned/managed by the Cheswick Plant Environmental Redevelopment Group, LLC, is a former coal-fired power plant located in Springdale, Pennsylvania. As of April 1, 2022, the station ceased operations and is presently being decommissioned in preparation for eventual demolition. The Rule applies to this facility due to the management of CCR that was generated from the previous combustion of coal. The only remaining CCR unit associated with the station includes the Cheswick Ash Disposal Site, following Closure by Removal in early-2021 of the two previously existing impoundments referred to as the Bottom Ash Recycle Pond and the Bottom Ash Emergency Pond. Documentation of the closure activities as performed in accordance with §257.102(c) is contained in a Closure Certification Report (GAI Consultants, Inc., April 2021), a copy of which is available on the publicly accessible website per §257.107(i)(8). The Ash Disposal Site is owned/managed by Cheswick Lefever, LLC.

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 Cheswick 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). Amendments to the Plan are made when material changes in site conditions and/or operations affect the management of the CCR units. Accordingly, an amended version of the Plan was most recently prepared (November 2022) to address administrative/ownership changes and to reflect the cessation of operations in April 2022.

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 seventh Annual Report for the Cheswick 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 Manager, including those logs specific to the one-year period (December 2021 to November 2022) relevant to this seventh Annual Report.

As acknowledged in Section 1.0 of this Report, the Cheswick Station ceased operations as of April 1, 2022. As such, there is no longer routine generation and management of CCR materials, including fly ash, bottom ash, and gypsum. Ongoing and future cleaning and decommissioning activities of certain structures and equipment items may generate incidental amounts of CCR and non-CCR materials, which may be taken to the Cheswick Ash Disposal Site.

2.1 Fly Ash Handling

Effective with the April 1, 2022 cessation of operations, fly ash is no longer generated at the station.

2.1.1 Monitoring/Recordkeeping

Prior to the cessation of operations, observations of visible emissions from the fly ash handling activities were performed once per week by station personnel during normal daylight hours. Corresponding records of the observations were documented in logs as follows:

- Daily records of each time the water suppression system was used at the fly ash silo (Log RCW 5.9-1A)
- Weekly records of visible emission observations of the fly ash handling operations and observations of fly ash wetting (Log RCW 5.10-1)

The completed logs were forwarded to the station's Environmental Manager and will be retained for at least five years, or until such time as deemed no longer necessary.

2.2 Bottom Ash Handling

Effective with the April 1, 2022 cessation of operations, bottom ash is no longer generated at the station.

2.2.1 Monitoring/Recordkeeping

Prior to the cessation of operations, observations of visible emissions from the bottom ash handling activities were performed once per week by station personnel during normal daylight hours.

Bottom ash handling records and visible emissions observations were maintained in weekly logs (Log RCW 5.10-1) and forwarded to the station's Environmental Manager. The completed logs will be retained for at least five years, or until such time as deemed no longer necessary.

2.3 Gypsum Handling

Effective with the April 1, 2022 cessation of operations, gypsum is no longer generated at the station.

2.3.1 Monitoring/Recordkeeping

Prior to the cessation of operations, observations of visible emissions from the gypsum handling activities were performed once per week by station personnel during normal daylight hours. Gypsum handling records and visible emissions observations were maintained in weekly logs (Log RCW 5.4-1) and forwarded to the station's Environmental Manager. The completed logs will be retained for at least five years, or until such time as deemed no longer necessary.

2.4 Transport Roadways

Paved and unpaved road surfaces internal to the station and the Cheswick Ash Disposal Site are watered, as needed, to reduce fugitive dust emissions, and this continues to apply during the ongoing decommissioning activities. 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 used varies seasonally. Roads and parking lots are also periodically swept to reduce potential entrainment of dust. Fugitive dust emissions are further controlled by posting and maintaining a maximum vehicle speed limit of 10 miles per hour (mph) within the boundaries of the station property.

Any trucks exiting the station that may be carrying CCR materials (incidentally generated from the ongoing decommissioning activities) are equipped with automatic tarping systems that are designed to provide an adequate seal and prevent windblown CCR emissions during transport. Drivers routinely inspect the tarping system for proper closure, tears, rips, or any other defects that could contribute to excessive dust emissions during transport.

2.5 Cheswick Ash Disposal Site

Effective with the April 1, 2022 cessation of operations, routine transport of CCR materials to the Cheswick Ash Disposal Site has been discontinued. However, fly ash, bottom ash, or gypsum that may be incidentally generated from the ongoing decommissioning activities will continue to be transported by tarped and washed trucks from the station to the Ash Disposal Site. Fugitive dust is minimized at the Ash Disposal Site 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 circulates as needed, to

spread water on the internal roadways and the open operating areas of the disposal site. Vehicle traffic operating within the disposal site is restricted to a 15 mph speed limit. Before exiting the Ash Disposal Site and returning to public roadways, trucks are required to pass through a truck wash to remove excess dust.

2.5.1 *Monitoring/Recordkeeping*

Seven dust fall monitors are installed at the Ash Disposal Site in locations approved by the Pennsylvania Department of Environmental Protection (PADEP). Dust Fall Reports are submitted to PADEP quarterly as a condition of the Solid Waste Permit. Records of dust control activities, including road watering and sweeping, are maintained as part of a Daily Operations Checklist. The completed checklists are forwarded to the station's Environmental Manager and will be retained for at least five years, or until such time as deemed no longer necessary.

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 Cheswick Station with regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of receipt, the station's Environmental Manager enters the citizen complaint into the station's Environmental Management Information System (EMIS) database. Following initial evaluation of the complaint, Cheswick 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 2021 through November 2022.

4.0 Summary of Corrective Actions Taken

For the December 2021 to November 2022 period of record, 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.