



Brunner Island, LLC



Disposal Area 8



Annual Fugitive Dust Control Report

December 8, 2020

1.0 INTRODUCTION

This report addresses the annual fugitive dust control reporting requirements in the Federal Coal Combustion Residuals (CCR) Rule specified in Title 40 of the Code of Federal Regulations (CFR), Section (§) 257.80(c). As detailed in 40 CFR §257.80(c), an annual report must be prepared and placed in the Site operating record within one year of placing the previous Annual Fugitive Dust Control Report in the operating record. The annual report must include:

- i. A description of actions taken to control CCR fugitive dust;
- ii. A record of all citizen complaints, if any; and
- iii. A summary of any corrective measures taken.

The annual report for the compliance period starting December 1, 2019 and ending November 30, 2020 is presented herein. This report was prepared by Ms. Marcia Thiess of Talen Energy.

2. FUGITIVE DUST CONTROL PROCEDURES

In accordance with the Fugitive Dust Control Plan and Section K: Dust Control Plan of the *Disposal Area 8 Landfill Operations and Improvement Plan* (May 5, 2020), the following standard procedures were followed at the Site during the reporting period to maintain CCR fugitive dust control during landfill operations:

The facility's Dust Control Plan has been developed to include pre-emptive procedures designed to reduce dust generation and methods to address dusting that may be encountered during regular site operations. Fugitive dust generated by the operation of the waste disposal area will be controlled through the measures discussed below to prevent visible dust from leaving the property. In general, the types of waste proposed for Disposal Area 8 do not generate significant dusting concerns.

During normal operations, the size of the active disposal face will be kept to the smallest practical size, which will limit the surface area of new waste being placed and the potential for wind erosion. The waste will have sufficient water content to avoid dust generation during its handling and placement. Dust was avoided and controlled by

watering the access road, and other landfill areas as needed, via water truck or firehoses, as appropriate. Following the placement and compaction of each waste lift, the lift will be smooth drum rolled to create a surface that is smooth, firm, hard, and resistant to wind or water erosion. CCRs were moistened prior to loading at their sources as needed, to prevent the potential for particles to become airborne during placement. Targeted moisture content is 20 percent to avoid and control dust and prevent free water flow. Within the active working area, liquids were applied via water truck to maintain optimum moisture content for compaction and dust control. Liquids used for dust control potable water. To maintain surfaces that have been smooth drum rolled, traffic on the disposal area will be directed to follow specific routes, and therefore limit disturbance of the waste surface by equipment and truck traffic.

Access roads within the disposal area may be surfaced with bottom ash or other available granular material to provide a more durable, lower dust-generating driving surface. Also, access roads outside of the disposal area will be routinely sprayed with water to control and reduce dust generation.

During filling, cover soil will be placed on final and interim waste slopes as described below:

- Daily cover will not be applied to waste surfaces that will receive additional lifts of waste. The wastes going to the disposal area are not expected to be prone to dusting and erosion. Cover soil stockpiles will be maintained at Brunner Island in case dusting becomes a problem.*
- One foot of intermediate cover capable of supporting vegetation will be placed on interim slopes that will be developed during filling on the eastern side of Cells 1 and 2. Also, intermediate cover will be placed following the completion of every second waste lift above the perimeter berm. The intermediate cover will serve to protect the slopes from wind and water erosion and will be stabilized with vegetation. To protect the top surface of each waste lift, equipment operation will be limited to planned access roads and to the active disposal area. To protect waste surfaces from wind and water erosion, the surface of the fresh waste will be rolled with a smooth drum roller at the completion of each day to "skin" the surface.*

The cover will be vegetated according to the Erosion and Sedimentation (E&S) Control Plan. The application of cover soil will protect final and interim waste slopes from wind and water erosion.

All grading operations on a project will be suspended when winds exceed 20 miles per hour or when winds carry dust beyond the property line despite implementation of all feasible dust control measures. Operation of the disposal area may include building up waste on one side of the disposal area to block wind from the predominant wind direction. Also, stockpiles of waste or soil shall be protected from the wind when possible by covering them or setting them behind a wind block.

3. DAILY INSPECTION RESULTS

To assess the effectiveness of the dust control procedures outlined above, daily inspections—when waste placement occurred—were conducted by the landfill manager. In addition, weekly fugitive dust inspections conducted by site personnel were recorded on the Brunner Island, LLC – Disposal Area 8 Weekly Fugitive Dust Inspection Logs. The weekly inspection logs showed that fugitive CCR emissions were not observed during the inspections, which indicated that the standard dust control procedures were effective at controlling CCR dust emissions from the Site.

4. CITIZEN COMPLAINTS

No citizen complaints were logged during the reporting period.

5. CORRECTIVE MEASURES

Because the daily / weekly inspections resulted in no observations of fugitive dust emissions, corrective measures were not necessary during the reporting period.

6. NOTIFICATION TO PA DEP AND CITIZENS

As required under 40 CFR Part §257.106(g), after posting the initial and subsequent Annual CCR Fugitive Dust report to the facility operating record, notification of the posting must be made to the PADEP Regional Waste Director.

This report is also required to be posted to the publicly available web-site as required under 40 CFR Part §257.107(g).

Date Posted to Facility Operating Record: 12/14/2020