



Brunner Island, LLC



Ash Basin 6



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

The following standard procedures were implemented at the Site during the reporting period to maintain CCR fugitive dust control during landfill operations:

- A. Dust was avoided and controlled by watering the access road, and other basin areas as needed, via water truck or firehoses, as appropriate.
- B. Exposed surfaces (soil or ash) along the sides of the ponded area were covered with tackifying agents and hydroseeded to prevent dusting.
- C. Non-active stockpiles of ash were coated with a dust suppressant to the exposed surfaces.
- D. Intermediate cover material of soil and seed was placed ovetop disturbed areas as the ash removal process progressed.
- E. All hauling trucks were covered with tarps to prevent fugitive dust emission. After a truck was loaded, the driver extended a heavy-duty tarp over the entire dump body, covering the material to avoid and control the potential for blowing dust during transit.

- F. Prior to exiting the Ash Basin 6 area, each loaded truck traveled through the truck and wheel wash system to prevent fugitive dust emissions when the trucks leave the site.
- G. The prescribed speed limit on site roads was enforced to reduce release of dust / particulate matter from trucks.

3. WEEKLY INSPECTION RESULTS

To assess the effectiveness of the standard CCR fugitive dust control procedures outlined above, weekly inspections were conducted by Brunner Island, LLC. The weekly inspections results were recorded on weekly inspection logs for the reporting period (i.e., December 1, 2019 through November 30, 2020). Those results 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 weekly inspections indicated that fugitive dust emissions were not observed, corrective measures were not necessary during the reporting period.

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