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# Annual CCR Fugitive Dust Control Report

Lon D. Wright Power Plant  
Fremont, Nebraska

Prepared for  
**City of Fremont Utilities Department**

401 E. Military Road  
Fremont, NE 68025

December 2017



TETRA TECH, INC.  
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## Section 1: Introduction

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### 1.1 Facility Information

<b>Facility Name:</b>	Lon D. Wright Power Plant
<b>Facility Street Address:</b>	2701 E. First St. Fremont, NE 68025
<b>24-Hour Facility Phone Number:</b>	(402) 727-2646
<b>Owner Name:</b>	<b>City of Fremont Utilities Department</b>
<b>Owner Address:</b>	400 E. Military Avenue Fremont, NE 68025

### 1.2 Purpose and Scope of the Annual CCR Fugitive Dust Control Report

This report is prepared in accordance with Section 5 of the facility's Fugitive Dust Control Plan (FDCP) to comply with 40 CFR 257.80(c). This is the second annual report covering the period since the previous Annual CCR Fugitive Dust Control Report was entered into the facility's operating record.

### 1.3 Methodology and Approach

The preparation of this report is based on an annual review consisting of a facility visit and personnel interview conducted on December 18, 2017 and review of documentation related to Coal Combustion Residual (CCR) fugitive dust control that was generated during the annual period including, but not limited to: Weekly CCR Unit Compliance Evaluations, citizen complaints, and any other available documentation relating to CCR Fugitive Dust Control.

## Section 2: Implementation of the FDCP and Annual Period Results

Procedures outlined in subsection 3.2 of the FDCP include CCR conditioning, personnel training and communications, routine evaluation of affected areas, contractor communications, and citizen complaint procedures. Potential control measures identified in subsection 3.3 of the FDCP are implemented as corrective measures when: (1) fugitive CCR dust is observed at the facility or (2) when weather conditions and/or operations activities are such that fugitive CCR dust is likely to occur. The following subsections 2.1 - 2.3 provide the annual period results of the implementation of the FDCP.

### 2.1 Actions Taken to Control Fugitive CCR Dust

As noted above, the facility implemented the FDCP to initiate formalized fugitive CCR dust control.

This period, fugitive CCR dust was observed on ten occasions at the facility and actions to control the fugitive CCR dust were taken as shown in Table 1 below:

**TABLE 1**  
**Fugitive CCR Dust Observations**

Date	Wind Direction and Speed	Actions Taken
February 27, 2017	SSE, 10 mph	Communications with applicable facility staff (fuel handling team) were conducted, site activities were limited, and water was applied to access roads and CCR piles.
March 6, 2017	S, 23 mph, + gusts	Communications with applicable facility staff (fuel handling team) were conducted, ash handling activities were suspended, and water was applied to access roads and CCR piles.
March 13, 2017	NNW, 12 mph	Communications with applicable facility staff (fuel handling team) were conducted and ash handling activities were suspended. Water was not applied due to below freezing temperatures.
March 20, 2017	NNE, 14 mph	Communications with applicable facility staff (fuel handling team) were conducted. Additional monitoring was conducted and water was applied during truck load outs.
August 7, 2017	N, 6 mph	Communications with applicable facility staff (fuel handling team) were conducted. Additional monitoring was conducted and water was applied during truck load outs.
October 23, 2017	NW, 25 mph + gusts	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
October 30, 2017	NW, 25 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
November 17, 2017	SSE, 10 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
December 4, 2017	WNW, 20 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
December 11, 2017	NW, 31 mph	Communications with applicable facility staff (fuel handling team) were conducted, ash handling activities were suspended, and water was applied to access roads and CCR piles.

Although no observation of fugitive CCR dust was recorded, additional monitoring of the CCR areas was performed as proactive measures on April 24, May 8, June 2, and August 21, 2017 due to expectations of moderate to high wind speeds. Water was applied on April 24 and June 2, 2017 as a proactive measure to prevent wind-blown fugitive CCR dust.

## **2.2 Citizen Complaint Records**

No citizen complaints were received this period.

## **2.3 Summary of Corrective Measures Taken**

As corrective measures to observations of fugitive CCR dust, the facility communicated with the fuel handling team, applied water to affected CCR handling and storage areas, minimized or suspended ash handling activities when weather conditions warranted, and implemented additional fugitive dust monitoring.