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 2016



TETRA TECH, INC. 6307 Center Street, Suite 210 Omaha, Nebraska

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Section 1: Introduction

1.1 Facility Information

Facility Name: Lon D. Wright Power Plant

Facility Street Address: 2701 E. First St.

Fremont, NE 68025

24-Hour Facility Phone Number: (402) 727-2646

Owner Name: City of Fremont Utilities Department

Owner Address: 400 E. Military Avenue

Fremont, NE 68025

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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 initial annual report covering the period since the initial Fugitive Dust Control Plan 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 5, 2016 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

The facility implemented subsections 3.2 and 3.3 of the FDCP pertaining to dust control procedures and potential dust control measures in October 2015 to initiate this annual period. 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 six 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
November 16, 2015	SE, 10 mph	Additional monitoring was performed.
March 7, 2016	S, 17 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the ash monofill access road and bottom ash pile
April 11, 2016	NNW, 18 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to access roads, piles, and open cells
August 1, 2016	ESE, 17 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied
September 23, 2016	S, 14 mph	Communications with applicable facility staff (fuel handling team) were conducted, ash handling activities were minimized, and water was applied
October 17, 2016	S, 12 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied

Additionally, water was applied to the CCR areas without observation of fugitive CCR dust and additional monitoring was performed as proactive measures on October 3 and 10, 2016 due to expectations of high wind speeds.

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 ash handling activities when weather conditions warranted, and implemented additional fugitive dust monitoring.