
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 2018



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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

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 third 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 3, 2018 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 10 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
January 15, 2018	NNW, 24 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.
February 19, 2018	NNW, 15 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.
April 30, 2018	S, 27 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.
May 7, 2018	SSE, 13 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
June 1, 2018	SSW, 14 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
July 9, 2018	SW, 10 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
July 16, 2018	NE, 7 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
August 27, 2018	SSE, 15 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
September 24, 2018	SE, 10 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.
October 29, 2018	S, 18 mph	Communications with applicable facility staff (fuel handling team) were conducted and water was applied to the CCR unit area.

Although no observation of fugitive CCR dust was recorded, additional monitoring of the CCR areas was performed as proactive measures on July 23 and November 19 due to expectations of moderate

to high wind speeds. Water was applied on July 23 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.