

# Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

Lon D. Wright Power Plant

City of Fremont Department of Utilities  
401 E Military Road  
Fremont, Nebraska 68025

**SCS ENGINEERS**

Report No. 27219425.00 | December 12, 2019

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# 1 INTRODUCTION

The City of Fremont Department of Utilities (FDU) operates the Lon D. Wright Power Plant located at 2701 East First Street in Fremont, Nebraska. The Lon D. Wright Power Plant operates 3 coal-fired electric generation units (Units 6, 7, and 8) each consisting of a boiler and steam turbine. The 3 coal-fired electric generation units share an ash handling system including silos, dewatering and settling tanks, and conveyance systems. Each unit has a dedicated baghouse. Additionally, Unit 8 ash handling system includes an electrostatic precipitator (ESP) and spray dryer absorber (SDA). Associated with the Lon D. Wright Power Plant is a CCR Landfill. The CCR Landfill is subject to the CCR Rule and in accordance with the rule must complete an Annual CCR Fugitive Dust Control Report as specified in Section §257.80(c) of the rule. In accordance with Section 5 of the facility's CCR Fugitive Dust Control Plan (FDCP), this document addresses the annual report for 2019.

This report describes the actions taken to minimize CCR fugitive dust from the CCR unit at this facility, provides a record of citizen complaints received since the previous report, and summarizes any corrective measures taken to minimize CCR fugitive dust.

# 2 DESCRIPTION OF THE ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

In accordance with the CCR FDCP developed for this facility, the following dust control procedures outlined in section 3.2 of the FDCP are to be used when needed to minimize CCR from becoming airborne:

- CCR Conditioning
- Personnel Training and Communications
- Routine Evaluation of Affected Areas
- Contractor Communications
- Citizen Complaint Protocol and Procedures

In accordance with the CCR FDCP developed for this facility, the following potential control measures outlined in section 3.3 of the FDCP are considered appropriate options to be used when needed to minimize CCR from becoming airborne:

- Application of additional water or chemical dust suppressant in problem areas and/or during specified weather conditions and/or specified activities
- Cease specified activities during times of moderate or high winds
- Reduce speed limits on haul roads
- Cover or provide wind blocks for specified activities or small areas that have the potential to disperse CCR ash via wind.
- Other measures as applicable.

During this reporting period (December 10, 2018 – November 25, 2019), CCR fugitive dust was observed on 3 occasions at the facility. These occasions, along with a description of the actions taken to control the fugitive CCR dust are described in Table 1 on the following page.

**Table 1 CCR Fugitive Dust Observations & Actions**

Date	Weather Observations	Actions Taken
January 28, 2019	Mostly Sunny, 21°F, 29 mph NW Wind	Ash handling activities were suspended. Water was not applied due to below freezing temperatures. All of the CCR unit was frozen and fugitive dust observed was intermittent.
September 30, 2019	Sunny, 85°F, 15 mph S Wind	Ash handling activities were suspended. Water was not applied due to the CCR unit being wet from recent rain events.
November 8, 2019	Sunny, 32°F, 12 mph S wind	Ash handling activities were suspended. Water was not applied due to below freezing temperatures.

Note: Ash handling activities were suspended as an additional proactive measure on April 29, 2019 due to high winds even though no CCR fugitive dust was observed.

### 3 RECORD OF CITIZEN COMPLAINTS

Citizen complaints pertaining to CCR fugitive dust are managed in accordance with the plan set forth in the CCR FDCP. There were no citizen complaints at this facility related to CCR fugitive dust during this reporting period.

### 4 SUMMARY OF CORRECTIVE MEASURES TAKEN

During observations of CCR fugitive dust, the facility communicated with the applicable staff involved in the ash handling processes, ceased ash handling activities as weather conditions deemed necessary, and applied water/ensured the CCR ash was wet from weather events when weather conditions allowed (not below freezing). Corrective measures in response to citizen complaints were not required during this reporting period.

### 5 PERIODIC REVIEW OF CCR FUGITIVE DUST CONTROL PLAN

The CCR FDCP is reviewed whenever there is a change in the conditions that would substantially affect the FDCP in effect. The CCR FDCP was created in October 2015, with no revisions to date.

### 6 RECORDKEEPING AND REPORTING

The Annual CCR Fugitive Dust Control Report is required to be prepared on an annual basis. The deadline for completing subsequent reports after the initial report is one year after the date of completing the previous report. For purposes of §257.80(c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by §257.105(g)(2).