

Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

Lon D. Wright Power Plant

City of Fremont Department of Utilities
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SCS ENGINEERS

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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, the ash handling system for Unit 8 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 2024.

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 via wind.
- Other measures as applicable.

During this reporting period (November 6, 2023 – October 28, 2024), CCR fugitive dust was observed on two occasions at the facility. CCR fugitive dust was observed on April 22, 2024, and June 24, 2024. 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
4/22/2024	70°F, 25 mph S. wind, Overcast	Water application to control on-site conditions
6/24/2024	83°F, 10mph SSE wind, Mostly sunny	Water application to control on-site conditions

Note: Water was applied as a Best Management Practice (BPM) throughout the CCR unit as an additional proactive measure during the reporting period even when 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 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).