



**GENON BRANDYWINE ASH STORAGE SITE
BRANDYWINE, MARYLAND
2019 ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

To: Walter Johnson, GenOn MD Ash Management LLC
From: Jeffrey Hutchins, P.E., AECOM
Date: December 12, 2019
RE: Annual CCR Fugitive Dust Control Report
Brandywine Ash Storage Site Operating Cell Phase 2

1.0 Introduction

As of April 17, 2015, the Brandywine Ash Storage Site (Brandywine Site) has been regulated by the Code of Federal Regulations (CFR) under 40 CFR §257 Subpart D – Standards for Disposal of Coal Combustion Residuals (CCR) in Landfills and Surface Impoundments. Section §257.80 required GenOn to prepare a CCR Fugitive Dust Control Plan and place it into GenOn’s operating record by October 19, 2015. Section §257.80(c) requires GenOn to prepare an annual CCR Fugitive Dust Control Report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The first annual report was completed and placed in GenOn’s operating record by December 19, 2016 – as required under the regulations – 14 months after placing the Initial CCR Fugitive Dust Control Plan in the facility’s operating record. Subsequent Annual Reports are required to be completed and placed in GenOn’s operating record one year after the date of completing the previous report. This 2019 Annual Report will be completed and placed in the GenOn operating record by December 19, 2019.

2.0 Summary of Current CCR Fugitive Dust Control Measures

The Brandywine Site has historically received and stored CCRs produced at GenOn’s Morgantown and Chalk Point Generating Stations. CCR transferred to the Brandywine Site has been offloaded and stored in the currently operational Phase 2 area (Phase 2A). During this reporting period from December 1, 2018 to December 1, 2019, GenOn has fully implemented the measures described in the Initial CCR Fugitive Dust Control Plan to control all sources of CCR fugitive dust resulting from GenOn operations at the Brandywine site.

During this 2019 reporting period, the Brandywine site has not received any additional CCR material from either of the two GenOn generating stations or from any other offsite sources. Consequently, GenOn has implemented all necessary CCR fugitive dust control measures to control fugitive dust from the existing Phase 2A site.

GenOn has not received any citizen input or complaints during this reporting period, and thus no corrective measures have been required to be implemented.

Fugitive Dust Control Measures

During the 2019 reporting period, because no new CCR material has been delivered to the Brandywine Site, fugitive dust control by GenOn has consisted of implementing dust control measures on the existing CCR surface of Phase 2A. GenOn personnel inspect the CCR surface of Phase 2A daily to determine if the CCR surface has dried to a point where

fugitive dust could be an issue in the near future. GenOn personnel utilize one of two methods to control fugitive dust at such time when it is deemed necessary to control CCR dust from Phase 2A.

- **Short Term:** GenOn utilizes a dedicated mobile water truck onsite that it fills from an onsite groundwater well. GenOn uses this dedicated water truck to spray water and thoroughly wet the existing CCR surface of Phase 2A.
- **Longer Term:** For longer term control of fugitive dust, GenOn uses a proprietary product "DustCap" manufactured by Terra Novo, which is a specifically formulated liquid product for dust control. It is a high concentration liquid (2.5 gallons) that is mixed with 4,000 gallons of water in the site's water truck and sprayed onto the CCR surface of Phase 2A. Once sprayed on the surface, DustCap forms a crusty surface on top of the CCR that maintains moisture in the CCR and inhibits the formation of dust. The crusty surface can last for many weeks if the crust is not broken by equipment or machinery riding on top of it.

Road Watering

During routine operations at the site and within Phase 2, paved areas and access roads are visually inspected on a daily basis to determine the presence of CCRs, sediment, and dust. All CCRs and sediment material are routinely removed and disposed of back into Phase 2A, and roads receive water applied from the site's dedicated mobile water truck to minimize dust generation. Unpaved areas that might carry vehicle traffic are visually inspected and receive water to reduce dust.

3.0 Citizen Input

The Site Supervisor maintains a formal log dedicated to citizen input and complaints regarding fugitive dust emissions from the Brandywine Site and public roads leading to the site. This form was included as part of the Initial CCR Fugitive Dust Control Plan. During the reporting period from December 1, 2018 to December 1, 2019, there were no citizen complaints or input provided by citizens recorded by the Site Supervisor. As a result, no corrective measures were required to be implemented.

4.0 Summary

During the reporting period from December 1, 2018 to December 1, 2019, GenOn implemented the measures presented in the Initial CCR Fugitive Dust control Plan to control fugitive CCR dust from the active Phase 2A cell at the Brandywine Site. During the reporting period, there were no citizen complaints or input recorded by the Site Supervisor and no corrective measures were required.

Reporting Company: AECOM

AECOM Representative: Jeffrey Hutchins

Date: 12/12/19



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