

Prepared for:

FORT ARMISTEAD ROAD – LOT 15 LANDFILL, LLC
3601 Fort Armistead Road
Baltimore, Maryland 21226

INITIAL ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Per Requirements of 40 CFR §257.80(c)

**Fort Armistead Road - Lot 15 Industrial Landfill
Baltimore, Maryland**

Prepared by:



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1. INTRODUCTION AND TERMS OF REFERENCE

Geosyntec Consultants (Geosyntec) has prepared this document for Fort Armistead Road – Lot 15 Landfill, LLC (a wholly owned subsidiary of Raven Power) for the Fort Armistead Road - Lot 15 Industrial Landfill (Lot 15 or the Site), located in Baltimore City, Maryland, to address the initial annual fugitive dust control reporting requirements in the Federal Coal Combustion Residuals (CCR) Rule specified in Title 40 of the Code of Federal Regulations (CFR), Section (§) 257.80(c). As detailed in 40 CFR §257.80(c), an initial annual report must be prepared and placed in the Site operating record within 14 months (i.e. before 19 December 2016) of placing the Initial Fugitive Dust Control Plan¹ in the operating record. The annual report must include: (i) a description of actions taken to control CCR fugitive dust; (ii) a record of all citizen complaints, if any; and (iii) a summary of any corrective measures taken. The initial annual report for the compliance period starting 19 October 2015 and ending 31 October 2016 is presented herein. This report was prepared by Mr. Adam Gray and reviewed by Mr. David Espinoza, Ph.D, P.E., both of Geosyntec.

2. FUGITIVE DUST CONTROL PROCEDURES

In accordance with the Fugitive Dust Control Plan, the following standard procedures were implemented at the Site during the reporting period to maintain CCR fugitive dust control during landfill operations:

- A. Dust was avoided and controlled by watering the access road, and other landfill areas as needed, via water truck or firehoses, if available.
- B. Within the active working area, liquids were applied via water truck to maintain optimum moisture content for compaction and dust control. Liquids used for dust control were primarily potable water, or leachate collected from Lot 15, which was approved for use within cell limits by the Maryland Department of the Environment (MDE).
- C. After the end of each working day, the active working area was hydro-mulched. Hydro-mulch is a moist-applied mulch that contains tackifying agents, which enable it to adhere to the surface on which it is applied. The same liquids used for dust control were used to moisten the mulch and combine it with the tackifying agents before application.
- D. CCRs were moistened prior to loading at the plant sources as needed, to prevent the potential for particles to become airborne during placement. Targeted moisture content was be 20% to avoid and control dust and prevent free water flow. Because of the short transportation distance from the power plants to the disposal site, and the tarp

¹ Geosyntec, 2015. CCR Rule – Fugitive Dust Control Plan – Lot 15 Landfill, Baltimore, Maryland, October 2015.

placed to prevent fugitive CCR emissions during transportation, the potential for loss of moisture during transportation was negligible.

- E. All hauling trucks were covered with tarps to prevent fugitive dust emission. After a truck was loaded, the driver extended a heavy-duty tarp over the entire dump body, covering the material to avoid and control the potential for blowing dust during transit.
- F. After disposal of CCRs at the active working area and prior to exiting the site, trucks transporting CCRs traveled through the truck and wheel wash system, when operable, to prevent fugitive dust when the trucks leave the site. If the truck/wheel wash system was not operable (e.g., when there is a risk of freezing or when undergoing maintenance), alternative measures were used to prevent dusting from the trucks (e.g., inspections, handheld water sprayers, manual scraping, and use of brooms, as needed, to manually clean the trucks and wheels before they left the working face).

3. DAILY INSPECTION RESULTS

To assess the effectiveness of the standard CCR fugitive dust control procedures outlined above, daily inspections were conducted by a representative from Charah, Inc., the Site operators. The daily inspections results were recorded on weekly inspection logs for the reporting period (i.e., 19 October 2015 through 31 October 2016). Those results showed that fugitive CCR emissions were not observed during the inspections, which indicated that the standard dust control procedures were effective at controlling CCR dust emissions from the Site.

4. CITIZEN COMPLAINTS

No citizen complaints were logged during the reporting period.

5. CORRECTIVE MEASURES

Because the daily inspections indicated that fugitive dust emissions were not observed, corrective measures were not necessary during the reporting period.