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December 7, 2016
File: 21.0056797.00

Mr. Kevin Schroeder
Kevin.schroeder@nrgenergy.com
Dunkirk Power LLC
106 Point Drive North
Dunkirk, NY 14150

Re: Annual CCR Fugitive Dust Control Report
Dunkirk Generating Station
Dunkirk, New York

Dear Mr. Schroeder:

GZA GeoEnvironmental of New York (GZA) presents this Annual Fugitive Dust Control Report to Dunkirk Power LLC (Dunkirk) for the existing generating plant in Dunkirk, New York and the plants associated coal combustion residuals (CCR) landfill, located in Pomfret, New York (Site). This annual report is required by the United States Environmental Protection Agency's (USEPAs) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, as presented in the Federal Register Volume 80 No 74 dated April 17, 2015. In accordance with §257.80(c), the station must prepare an annual fugitive dust control report that includes the following information:

- A description of actions taken to control CCR fugitive dust
- A record of all citizen complaints
- A summary of any corrective actions taken

A Fugitive Dust Control Plan for the CCR units, including plant areas and surface impoundments and landfills at NRG's Dunkirk Generating Station was prepared on October 13, 2015. This plan was created in accordance with 40 CFR 257.80(b) and identifies measures to be taken by the facility to control/minimize CCR from becoming airborne at the facilities. We note that the power plant has recently been mothballed and associated equipment has been prepared for long term storage and is currently not in operation and therefore is not currently generating CCR waste.

Actions Taken: Since October 2015, the facility operations have been done in accordance with the requirements of the CCR Fugitive Dust Control Plan.

Standard operations at the CCR landfill utilize a temporary cover (an approximate 6 to 12 inches of topsoil) to reduce the potential for generation of fugitive dust and for erosion control at the upper portions of the landfill and access roads within the plant and landfill areas were routinely watered on dry days to reduce potential from dust generation resulting from vehicular traffic.

In addition to typical watering methods, two separate applications of a surfactant solution were applied (i.e., DusTreat DC9136) to active/exposed portions of the CCR impoundment for



dust suppression and erosion protection from wind and rain. This material generally provided a crust-like surface to protect the exposed CCR for extended periods of time, as compared to typical wetting methods.

Citizen Complaints: No citizen complaints were reported to either Dunkirk Power or the New York State Department of Environmental Conservation (NYSDEC) since implementation of the Fugitive Dust Control Plan in October 2015.

Corrective Action Summary: Because the facility routinely controlled the work areas from generation of airborne dust by wetting methods (an applications of dust suppression and the covering of exposed impoundment CCR, and due to no citizen complaints of fugitive dust, corrective actions were not required to be made at the Site since the Fugitive Dust Control Plan was implemented.

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.80(c) Annual CCR Fugitive Dust Control Report Requirements. The undersigned registered professional engineer attests that this annual report has been prepared in accordance with good engineering practice, including consideration of applicable state regulatory requirements and meets the requirements of §257.80(c), and that this plan is adequate for NRG - Dunkirk Power. This certification was prepared as required by §257.80(c).

Name of Professional Engineer: Daniel J. Troy, P.E.
Company: GZA GEOENVIRONMENTAL OF NEW YORK

Signature: 

Date: December 7, 2016
PE Registration State: New York
PE Registration Number: 081139-1



Professional Engineer Seal:

We trust this information satisfies your needs for this project.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK


Daniel J. Troy, P.E.
Senior Project Manager


Bart A. Klettke, P.E.
Principal