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November 22, 2024  
File: 21.0056984.10

Mr. George Streit  
[George.Streit@nrg.com](mailto:George.Streit@nrg.com)  
Dunkirk Power LLC  
106 Point Drive North  
Dunkirk, NY 14150

Re: 2024 Annual CCR Fugitive Dust Control Report  
Dunkirk Generating Station  
Dunkirk, New York

Dear Mr. Streit:

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 plant's 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 been shut down and is no longer in operation and therefore the Site no longer generates 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 vegetative covered topsoil) to reduce the potential for generation of fugitive dust and for erosion control at the upper portions of the landfill. Access roads within the plant and landfill areas were routinely watered on dry days, as needed, to reduce potential of dust generation from occasional vehicular traffic. We note that activities at the plant and landfill areas have primarily been limited to routine O&M activities (e.g., grass mowing, snow plowing, groundwater sampling, etc.).

**Citizen Complaints:** No citizen complaints were reported to either Dunkirk Power or the New York State Department of Environmental Conservation (NYSDEC) for the 2024 inspection period.

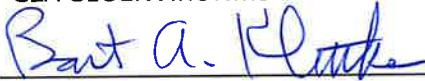


**Corrective Action Summary:** Due to limited vehicle/construction equipment traffic, the facility controlled the work areas from generation of airborne dust by wetting methods (and establishing a vegetated cover system over exposed/remaining active CCR impoundments) when needed, and due to no citizen complaints of fugitive dust, corrective actions were not required to be made at the Site since the previously issued Fugitive Dust Control Report of December 2023.

**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: Bart A. Klettke, P.E.  
Company: GZA GEOENVIRONMENTAL OF NEW YORK

Signature: 

Date: November 22, 2024  
PE Registration State: New York  
PE Registration Number: 069423-01




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