December 5, 2017

Nancy Overesch, P.G., CPEA
Environmental Affairs Officer
Lower Colorado River Authority

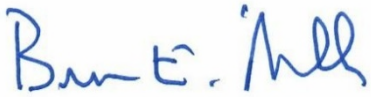
RE: Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report – 2017
Fayette Power Project

Dear Ms. Overesch:

Attached please find the Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report for 2017. This purpose of this report is to maintain compliance with 40 CFR 257.80(c) at the Fayette Power Project and requires inclusion in the facility's operating record.

Please feel free to contact us at your earliest convenience to discuss any questions or concerns you may have.

Thank you,



Bruce E. Mills
Waste Management National Services
Sr. Project Manager

Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

for the

LCRA Fayette Power Project

Revision 1

December 2017

Prepared For

Prepared By

The purpose of this Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report (i.e., Annual Report) is to maintain compliance with 40 CFR 257.80(c) which requires owners and operators of CCR landfills 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.

This Annual Report has been prepared by Waste Management National Services, Inc. (WMNS), as operator of the on-site landfill for the Fayette Power Project located in La Grange, Texas. The landfill is owned by the Lower Colorado River Authority. This Annual Report has been prepared following the template included in the CCR Fugitive Dust Control Plan and will be included in the facility's operating record.

Reporting Year:	2017

Description of Actions to Control Fugitive Dust:	*Place a copy of all methods contained in the Best Management (Section V.) and/or provide specifics in the space below.*
	1. Locating CCR inside an enclosure or partial enclosure Enclosures and partial enclosures are utilized to prevent fugitive emissions from products prior to placement in the landfill: • Fly ash is stored in silos • Bottom ash is stored in three-sided bays with curb protection • Gypsum is stored in a fully-enclosed dome building
	2. Operating a water spray system WMNS utilizes wet suppression methods exclusively. Plant water is used to surface treat via water truck application on all of the plant and landfill roads, as well as the landfill itself. Dust suppression efforts are implemented per the water truck schedule provided weekly by LCRA, and when visible observations indicate a need for corrective measures.
	3. Reducing fall distances at material drop points Engineered solutions are utilized to reduce fall distances at material drop points as much as possible: • Fly ash is transferred from the silos to trucks using telescoping chutes • Bottom ash is transferred from conveyors to the bays at the lowest practical point; it should be noted that bottom ash at this point has sufficient moisture to prevent dusting • Gypsum is transferred to the dome building at the lowest practical point; it should be noted that gypsum at this point has sufficient moisture to prevent dusting When products are transferred to the landfill, products exit the truck bed directly onto the landfill surface. Water is applied for dust control via a sprinkler system and/or water truck to condition CCR as required for compaction and dust control.
	4. Compaction WMNS utilizes a CAT CS74, or equivalent, vibratory smooth drum roller to compact the material to the landfill design compaction standards.
	5. Interim covers Fly ash that is properly compacted normally forms a “crust” that resists water and wind erosion. Once a portion of the fill area has reached final grade, operators avoid running equipment on these areas until an intermediate cover of bottom ash or other suitable material is applied. Soils removed and stockpiled onsite during the construction of the new landfill cell have been regraded and seeded to prevent generation of fugitive dust from this material.

6. Establishing and enforcing vehicle speed limits WMNS follows posted speed limits that vary between 10 mph on smaller roads and up to 30 mph on paved, plant roadways. Vehicle traffic is also restricted in inactive landfill areas to avoid breaking formed crusts, in an effort to prevent fugitive emissions.
7. Roads Trucks hauling CCR utilize designated haul roads and adhere to the plant speed limit. WMNS waters all paved and unpaved roads. All paved roads are kept free of CCR. Spills are promptly cleaned up.
8. Covering trucks transporting CCR Sealed pneumatic trucks are used to transport fly ash that is sold to market. Dump trailers used to transport bottom ash and gypsum to market utilize closed tailgates, tarps, and adequate freeboard to prevent spillage. This material is also moisture conditioned prior to loading to minimize dust generation. Dump trucks hauling CCR to the landfill have closed tailgates, tarps (where necessary), and are loaded with adequate freeboard to prevent spillage. At the end of each day, trucks hauling CCR are emptied and cleaned of any excess materials.
9. Reducing or halting operations during high wind events WMNS temporarily suspends major loading/unloading operations during high wind events (> 40 mph), when they have occurred.

Citizen Complaints:	*Place a copy of all citizen complaints recorded in Appendix A.*
	No citizen complaints were received for the LCRA Fayette Power Project. Therefore, no records are available to include as an appendix.

Comments:	Based on several factors (i.e., no visible emissions, no airborne dust crossing the property line, no dust tracked off-site, no violations/complaints, etc.), the measures outlined in the existing CCR Fugitive Dust Control Plan and implemented by WMNS are effective at controlling fugitive dust for the LCRA Fayette Power Project.
	There are no new or changing operations at the LCRA Fayette Power Project that would require incorporation and/or reflection in the CCR Fugitive Dust Control Plan.
	Therefore, no plan amendments are anticipated at this time.