Annual CCR Fugitive Dust Control Report

for

Zimmer Power Station

Prepared for:

Dynegy Zimmer, LLC

Zimmer Power Station
1781 US Rt. 52
Moscow, OH 45153

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Zimmer Power Station
ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Reporting Year: 4th Quarter 2015 through 3rd Quarter 2016

Completed by: Benjamin B Allright — Managing Director - Plant Operations

Name — Title

This Annual CCR Fugitive Dust Control Report has been prepared for the Zimmer Power Station in accordance with 40 CFR 257.80(c). Section 1 provides a description of the actions taken to control CCR fugitive dust at the facility during the reporting year, including a summary of any corrective measures taken. Section 2 provides a record of citizen complaints received concerning CCR fugitive dust at the facility during the reporting year, including a summary of any corrective measures taken.

Section 1 Actions Taken to Control CCR Fugitive Dust

In accordance with the Zimmer Power Station CCR Fugitive Dust Control Plan (Plan), the following measures were used to control CCR fugitive dust from becoming airborne at the facility during the reporting year:

CCR Activity	Actions Taken to Control CCR Fugitive Dust
Management of CCR in the facility's CCR units	CCR to be emplaced in the landfill is conditioned before loading into vehicles for transport to the landfill.
	Use of natural wind barriers, where possible, while unloading trucks at the landfill.
	Wet management of CCR bottom ash in bottom ash dewatering bins.
	Water, or cover with soil, areas of exposed CCR in CCR units, as necessary.
	Use of a water spray system at landfill during load-in activities.
	Naturally occurring grass vegetation in areas of exposed CCR in CCR surface impoundments.
	Avoid emplacing CCR materials at the landfill during wind conditions that will cause excessive CCR fugitive dust.

CCR Activity	Actions Taken to Control CCR Fugitive Dust
Management of CCR in the facility's CCR units	Apply chemical dust suppressant on areas of exposed CCR in CCR units, as necessary.
Handling of CCR at the facility	Wet sluice CCR bottom ash to the bottom ash dewatering bins.
	CCR bottom ash is dewatered and loaded into trucks for transport remains conditioned during handling.
	Wet sluiced flue gas desulfurization product materials (gypsum) is dewatered via a vacuum belt and remains sufficiently wet for placement at the FGD pad as well as transporting to the landfill.
	Pneumatically convey dry CCR fly ash to storage silos in an enclosed system.
	CCR fly ash to be emplaced in the landfill is conditioned before loading into trucks for transport to the landfill.
	Load CCR transport trucks from the CCR fly ash silos in an enclosed area with water sprays at the enclosure entrance.
	Load CCR transport trucks from the CCR fly ash silos using a telescoping chute.
	Perform housekeeping, as necessary, in the fly ash loading area.
	Operate fly ash handling system in accordance with good operating practices.
	Maintain and repair as necessary dust controls on the fly ash handling system.
Transportation of CCR at the facility	CCR to be emplaced in the landfill is conditioned before loaded into vehicles for transport to the landfill.
	Condition, cover or enclose all materials placed in trucks used to transport CCR materials to the landfill.
	Limit the speed of vehicles to no more than 15 mph on non-landfill facility roads.
	Limit the speed of vehicles traveling on paved landfill roads to no more than 30 mph and the speed of vehicles traveling on unpaved landfill roads to no more than 15 mph.
	Condition, cover or enclose all materials placed in trucks used to transport CCR materials on facility roads, other than the landfill roads, as necessary.
	Sweep or rinse off the outside of the trucks transporting CCR, as necessary.
	Use of a water washing system for the wheels of haul trucks using the landfill roads and parking areas.
	Remove CCR, as necessary, deposited on facility paved road surfaces during transport.

CCR Activity	Actions Taken to Control CCR Fugitive Dust
Transportation of CCR at the facility	Apply chemical dust suppressant on unpaved landfill roads at least bi-monthly, or as necessary.

Except as described below in Section 2 concerning fugitive dust events involving removal of gypsum from the gypsum stockpile area at the Zimmer Station landfill, based on a review of the Plan and inspections associated with CCR fugitive dust control performed in the reporting year, the control measures identified in the Plan as implemented at the facility effectively minimized CCR from becoming airborne at the facility. No revisions or additions to control measures identified in the Plan were needed.

No material changes occurred in the reporting year in site conditions potentially resulting in CCR fugitive dust becoming airborne at the facility that warrant an amendment of the Plan.

Section 2 Record of Citizen Complaints

During high wind conditions, the facility experienced CCR fugitive dust events while removing gypsum from the gypsum storage area located at the Zimmer Station landfill. The gypsum was being removed and hauled for beneficial reuse. The following citizen complaints were received regarding CCR fugitive dust from the gypsum storage area:

Date of Complaint	Complainant	Description of Complaint	Summary of Corrective Measures Taken
February 3, 2016 (Winds at 30-40 miles per hour (mph))	D. Utter	Blowing dust from landfill impacted house and land	Increased water application at gypsum storage area to control dust.
February 19, 2016 (Winds at 20-30 mph, gusts to 40 mph)	D. Utter	Blowing dust from landfill impacted structures and land	Zimmer evaluated measures to control dust at gypsum storage area and implemented the following: • Developed a system to provide weather forecast to prepare gypsum area for forecast high winds (i.e., weather forecasts monitored so that prior to forecasted high winds gypsum removal operations could be halted, as needed, and the area could be treated with water). • Increased water application practices during high wind conditions, including using two water trucks at the gypsum storage area. • Cut down profile (top) of gypsum stockpile to reduce potential for blowing dust from gypsum area during high wind conditions. • Beginning in mid-March, applied hydro-mulch
	W. Blakely	Dust blowing from landfill onto property	

			to cut down area to control dust potential. • Beginning in June and into July, one inch of clay, grass seed and straw cover was placed on the gypsum storage areas where gypsum was no longer removed. Follow-up communication with one complainant; attempt to follow-up with the other complainant was unsuccessful.
April 2, 2016 (Winds at 25-35 mph, gusts 50-59 mph)	Anonymous	Dust from landfill. (Also, odor from landfill and visual appearance of landfill.)	Continued to implement the above identified corrective measures. Accelerated gypsum removal operations in order to complete the project and cover the area. Follow-up communication with the two known complainants.
	W. Blakely	Dust blowing from the landfill	
	G. Nichols	Dust blowing from the landfill	
September 15, 2016 (Winds ranged 8-10 mph, gusts 20 mph)	G. Nichols	White film on vehicles, windows and lake	Gypsum removal operations completed on September 2, 2016. Began installation of temporary cover of area. Follow-up communication with complainant.
September 19, 2016 (Winds ranged 6-18 mph, gusts 25 mph)	D. Utter	Dust blown onto pond	Gypsum removal operations completed on September 2, 2016. Began installation of temporary cover of area. Follow-up communication with complainant.

On June 21, 2016, Zimmer Power Station personnel met with the known citizen complainants and several other landowners with property adjacent to the Station landfill to discuss the gypsum removal operations at the landfill and the fugitive dust corrective measures. The gypsum fugitive dust issues and corrective measures were also discussed with Clermont County Public Health and Ohio Environmental Protection Agency representatives during the district/agency's June 17, 2016 inspection of the Zimmer Station landfill.

On September 2, 2016, Zimmer Power Station completed the gypsum removal project and permanently ceased removing gypsum from the gypsum storage area at the landfill. Grading and covering the area was completed on October 26, 2016.