

2019 ANNUAL FUGITIVE DUST CONTROL REPORT

Lockwood Ash Disposal Site

Facility No. 62N01

Town of Torrey, Yates County, New York

Prepared on behalf of:

Lockwood Hills LLC

590 Plant Road

P.O. Box 187

Dresden, New York 14441

Prepared by:



2620 Grand Island Blvd.

Grand Island, New York 14072-2131

December 2019

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1 INTRODUCTION

The final rule on Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities (Rule) published by the United States Environmental Protection Agency (US EPA) under 40 CFR § 257 regulates CCR disposal as a solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA).

Part 257.80(b) of the Rule defines air operating criteria for CCR landfills and requires that a fugitive dust control plan be developed. This Fugitive Dust Control Plan (Plan) was developed for the Lockwood Ash Disposal Site by Daigler Engineering, P.C. (DE). The Plan describes methods to minimize the amount of CCR waste that becomes airborne at the facility, how to log citizen complaints, how to assess the Plan's effectiveness, and annual reporting requirements.

Consistent with 40 CFR § 257.80(c), this annual fugitive dust control report includes descriptions of the measures taken to control fugitive dust, records of citizen complaints, a summary of corrective actions taken by Lockwood Hills LLC, an assessment of the effectiveness of the Plan, and certification of the report by a duly licensed professional engineer.

1.1 SITE DESCRIPTION

Lockwood Hills LLC (Lockwood Hills) manages the Lockwood Ash Disposal Site (Lockwood or the Facility), an ash monofill located in the Town of Torrey, Yates County, New York on Swarthout Road. Lockwood Hills maintains a 6 NYCRR Part 360 Solid Waste Management Facility permit (Permit No. 8-5736-00005/00003) for this facility issued by the New York State Department of Environmental Conservation (NYSDEC). The permit allows Lockwood to accept fly ash, bottom ash, pulverizer mill rejects and wastewater treatment plant sludge.

2 FUGITIVE DUST CONTROL

2.1 DUST CONTROL MEASURES

A complete description of dust control measures that may be used at the Facility is included in the Plan. In general, activity onsite during 2019 was limited. The waste accepted by Lockwood during 2019 consisted of an ash/sediment mixture derived from onsite construction activities. Due to the moisture content of this waste, no additional wetting of the waste was required. Dust control measures included deposition of waste on relatively flat surfaces and the use of interim cover once the waste was sufficiently solidified.

The predominant dust control measure used during 2019 was use of a water truck on onsite roads and construction areas. The water truck was used to control fugitive dust derived from construction related activities that took place during the summer of 2019. Additionally, fugitive dust derived from vehicle operation was minimized by imposing speed limits on vehicles.

2.2 CITIZEN COMPLAINTS

There were no citizen complaints in 2019.

2.3 CORRECTIVE ACTIONS

No corrective actions were necessary in 2019.


2.4 EFFECTIVENESS OF FUGITIVE DUST PLAN

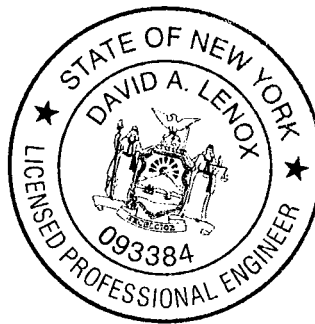
During an annual qualified professional engineer facility inspection, conducted on October 30th, 2019 by David Lenox, P.E. of DE, dust was being adequately controlled onsite. This annual inspection included a review of weekly inspection forms that document the effectiveness of dust control measures at the Facility. A review of these weekly inspection reports starting May 29th, 2019 through October 30th, 2019 showed that fugitive dust was adequately controlled.

3 PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I am familiar with the requirements of 40 CFR § 257.80(c) and that this annual fugitive dust control report has been prepared in accordance with good engineering practice, including consideration of applicable state regulations, and the requirements of 40 CFR §257.80(c).

I am a duly licensed professional engineer in the State of New York.


David Lenox, P.E.



NYSPE LIC # 093384