

2023 Annual Fugitive Dust Control Report

Greenidge Power Generating Station



**Greenidge Generation LLC
590 Plant Road
Dresden, New York**

December 2023

Prepared by:



ENGINEERING+
ENVIRONMENTAL

EnSol, Inc.
661 Main St.
Niagara Falls, NY 14301
716.285.3920

ensolinc.com

Table of Contents

- Section 1. Introduction.....1-1**
 - 1.1 Site Description..... 1-1

- Section 2. Fugitive Dust Control.....2-1**
 - 2.1 Citizen Complaints.....2-1
 - 2.2 Corrective Actions.....2-1
 - 2.3 Effectiveness of Fugitive Dust Control Plan2-1

- Section 3. Professional Engineer Certification.....3-1**

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).

Subsection 257.80(b) of the Rule requires that a fugitive dust control plan be developed to help minimize CCR waste from becoming airborne. A Fugitive Dust Control Plan was developed for the Greenidge Power Generating Station by Greenidge Generation LLC (Greenidge), dated November 2020. 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 Greenidge, an assessment of the effectiveness of the Plan, and certification of the report by a duly licensed professional engineer.

1.1 Site Description

Greenidge operates an electric power plant in the Town of Torrey, Yates County, New York. The Greenidge Power Generating Station sat idle between the spring of 2011 and March 2017. In connection with its operations, Greenidge utilizes a 7.2-acre CCR impoundment (the C-Pond) which historically received CCR, as well as a mixture of plant process waters and stormwater. While in C-Pond, CCR and wastewater underwent sedimentation as well as infiltration before effluent was discharged to Seneca Lake pursuant to a New York State Pollutant Discharge Elimination System ("SPDES") permit (No. NY0001325). After conversion to natural gas, C-Pond only received non-CCR wastewaters. Under approval from the New York State Department of Environmental Conservation, a diversion pipe was installed to bypass C-Pond to pursue closure of the CCR impoundment under the CCR Rule. Construction of the bypass was completed in the summer of 2023. As of October 10, 2023, all flows to C-Pond ceased and a Notice of Intent to Close per 40 CFR 257.102(g) was placed in the Greenidge Operating Record on November 8, 2023. The C-Pond will be closed in general accordance with the requirements in 40 CFR 257.102 according to the Revised Greenidge Closure Plan (AECOM, 2023).

2. Fugitive Dust Control

A complete description of dust control measures that may be used at the Facility is included in the Plan. In general, fugitive dust control methods are to be practiced when the potential for nuisance conditions arise. The potential for nuisance conditions is identified as an area with exposed CCR during periods of dry and windy weather. The measures to be employed include standard procedures such as water truck usage on site roads or areas of exposed CCR, imposing speed limits on vehicles to minimize kick-up of dust, and maintaining vegetative cover to the extent possible in the incised CCR impoundment.

2.1 Citizen Complaints

There were no citizen complaints in 2023.

2.2 Corrective Actions

No corrective actions were necessary in 2023.

2.3 Effectiveness of Fugitive Dust Control Plan

Subsection 257.83(a) of the Rule requires routine inspections by a qualified person and defines inspection requirements for CCR surface impoundments. In accordance with the Final Fugitive Dust Plan, these weekly inspections include an assessment of fugitive dust conditions. The weekly inspections will describe any observed fugitive dust and identify its source so corrective actions may be employed. Weekly inspection reports between the period of 01/04/2023 and 12/13/2023 were reviewed for this annual report. No instances of nuisance dust conditions were identified. Therefore, it has been determined that the existing Fugitive Dust Control Plan is adequately controlling dust at the Greenidge Facility.

Now that all remaining non-CCR flows to C-Pond have ceased, special attention shall be paid to the former pond area during weekly inspections to ensure CCR does not become airborne as it dewateres prior to final closure.

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



12/19/2023

ENSOL, INC.