

BRICKHAVEN STRUCTURAL FILL PROJECT

2019 Annual Fugitive Dust Control Report



February 11, 2019

Owner:

**Green Meadow, LLC
12601 Plantside Drive
Louisville, Kentucky 40299**

Facility:

**Brickhaven Mine Facility
1271 Moncure-Flatwood Road
Moncure, NC 27559**

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1.0 Introduction

This Annual CCR Fugitive Dust Report has been prepared pursuant to the criteria of 40 CFR part 257.80(c). The Annual Report summarizes activities described in the Fugitive Dust Control Plan and includes the following components: description of actions taken to control fugitive dust; a record of all citizen complaints; and a summary of any corrective actions taken.

This Annual Report addresses the period from January 1, 2019 to December 31, 2019. The Annual Report is deemed complete when the report is placed in the facility's operating record.

The Annual Report will be placed in the operating record and retained in the Environmental Records at the Brickhaven office. The Report will also be placed on the Green Meadow, LLC, Brickhaven CCR Rule Compliance Data and Information publicly accessible website.

2.0 Facility Description and Contact Information

2.1 Facility Description:

Green Meadow, LLC owns and Charah, Inc. operates the Brickhaven No. 2 Mine Structural Fill site located in Chatham County, off Moncure-Flatwood Road in Moncure, North Carolina under NCDEQ Mine Permit No. 19-25 and NCDEQ Structural Fill Permit 1910-STRUCT-2015. The mine property consists of approximately 301 acres. The property was previously owned and operated by General Shale. The structural fill, including associated perimeter berms, channels, and haul roads, encompasses approximately 80 acres, of which approximately 72 acres have been covered with a composite liner system for subsequent CCP placement.

2.2 Facility Contact:

Name:	<u>Tom Flannagan - Project Director</u>
Address:	<u>1271 Moncure-Flatwood Rd. Moncure, NC 27559</u>
Telephone:	<u>(704) 985-2992</u>
Email:	<u>tflannagan@charah.com</u>

3.0 Fugitive Dust Controls

The following fugitive dust control measures were implemented during the period addressed by this Annual report.

- Site Roadways – Roadways were watered as needed and speed control measures were implemented. Specifically, two water trucks (2 - 5,000 gallon) were routinely utilized to control dust at the site and associated haul roads.

- Structural Fill – Cover practices are an integral component of dust control at Brickhaven. As the placed ash increases in elevation within the structural fill cells, site operations constructed berms to break prevailing winds. Also, the CCR material was moisture conditioned, spread and compacted as it was unloaded. On a routine basis, a water truck added moisture to the CCRs to enhance compaction and provide dust control. Interim cover consisting of at least 12 inches of native soil was incorporated in the intermediate cover application at both the cap and perimeter slopes.
- Transporting material – fugitive dust is controlled during transportation by maintaining adequate moisture content within the CCRs, mitigating speed limits for the haul trucks to and from the rail offloading area to the structural fill cell(s), and maintaining moisture along the haul route to ensure minimal road material dusting occurs during transport.
- Unloading of material – Unloading dust emissions were controlled by maintaining moisture in the material and minimizing drop height. Dust emissions on the working surface of the unloading areas were controlled by watering as needed and speed control measures.

4.0 Citizen Complaint Log

Generally, complaints made to the site are by telephone and received by the site’s Environmental Protection Specialist. All complaints are entered into a log by the Environmental Protection Specialist noting the nature of the complaint, date, time, and other relevant details. All complaints are addressed as follows: reviewing site operations at the time of the complaint, reviewing inspection records, reviewing weather data, and interviewing site operations personnel.

No complaints were received by the site Environmental Protection Specialist during the period addressed by this Annual Report.

5.0 Plan Assessment

The Plan will be reviewed periodically to verify the effectiveness, and amended as necessary, and documented by the plan amendments. The site Environmental Protection Specialist reviewed the inspection records and operating means and methods and determined that no additional dust control measures or plan modifications were warranted during the period for this report.


6.0 Recordkeeping, Notification, and Internet Requirements

In accordance with CCR Rule §257.80 (d), the owner or operator of the CCR unit will comply with the recordkeeping requirements specified in CCR Rule §257.105(g), the notification requirements specified in CCR Rule §257.106(g), and the internet requirements specified in CCR Rule §257.107(g).

7.0 Signatures



Tom Flannagan, Project Director



Norman Divers, Director – Engineering,
Environmental and Quality



Scott A. Sewell, Managing Member, Green
Meadow, LLC