Prepared for:

FORT ARMISTEAD ROAD – LOT 15 LANDFILL, LLC
2030 Brandon Shores Road
Baltimore, Maryland 21226

ANNUAL CCR FUGITIVE DUST CONTROL REPORT - 2025

Per Requirements of 40 CFR §257.80(c)

Fort Armistead Road - Lot 15 Industrial Landfill Baltimore, Maryland

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1. INTRODUCTION AND TERMS OF REFERENCE

Geosyntec Consultants (Geosyntec) has prepared this document for Fort Armistead Road – Lot 15 Landfill, LLC (a wholly owned subsidiary of Raven Power) for the Fort Armistead Road – Lot 15 Industrial Landfill (Lot 15 or the Site), located in Baltimore City, Maryland, to address the annual fugitive dust control reporting requirements in the Federal Coal Combustion Residuals (CCR) Rule specified in Title 40 of the Code of Federal Regulations (CFR), Section (§) 257.80(c). As detailed in 40 CFR §257.80(c), an annual report must be prepared and placed in the Site operating record within one year of placing the previous Annual Fugitive Dust Control Report[1] in the operating record. The annual report must include: (i) a description of actions taken to control CCR fugitive dust; (ii) a record of all citizen complaints, if any; and (iii) a summary of any corrective measures taken. The annual report for the compliance period starting 1 November 2024 and ending 31 October 2025 is presented herein. This report was prepared by Samantha Fuchs, Ph.D. and reviewed by Yovanna Cortes Di Lena, PhD., P.E. and Adam Gray, P.G., all of Geosyntec.

2. FUGITIVE DUST CONTROL PROCEDURES

In accordance with the Fugitive Dust Control Plan (FDCP)[2], the following standard procedures were implemented at the Site during the reporting period to maintain CCR fugitive dust control during landfill operations:

A. Dust was avoided and controlled by watering the access road, and other landfill areas as needed, via water truck or firehoses, as appropriate.

B. Within the active working area, liquids were applied via water truck to maintain optimum moisture content for compaction and dust control. Liquids used for dust control were primarily potable water, or leachate collected from Lot 15, which was approved for use within cell limits by the Maryland Department of the Environment (MDE).

C. After the end of each working day, the active working area was hydro-mulched. Hydro-mulch is a moist-applied mulch that contains tackifying agents, which enable it to adhere to the surface on which it is applied. The liquids used for dust control were also used to moisten the mulch and combine it with the tackifying agents before application.

D. CCRs were moistened prior to loading at the plant sources as needed, to prevent the potential for particles to become airborne during placement. Targeted moisture content is 20 percent to avoid and control dust and prevent free water flow. Due to the short transportation distance from the power plants to the disposal site, and the use of tarps to

[1] Geosyntec, 2024. Annual CCR Fugitive Dust Control Report, Fort Armistead Road - Lot 15 Industrial Landfill, Baltimore, Maryland, December 2023.
[2] Geosyntec, 2021. Fugitive Dust Control Plan – Revision 1, Lot 15 Landfill, Baltimore, Maryland, January 14, 2021.

prevent fugitive CCR emissions during transportation, the potential for loss of moisture during transportation was negligible.

E. Hauling trucks were covered with tarps to prevent fugitive dust emission. After a truck was loaded, the driver extended a heavy-duty tarp over the entire dump body, covering the material to avoid and control the potential for blowing dust during transit.

F. After disposal of CCRs at the active working area and prior to exiting the site, trucks transporting CCRs traveled through the truck and wheel wash system, when operable, to prevent fugitive dust emissions when the trucks leave the site. If the truck/wheel wash system was not operable (e.g., when there is a risk of freezing or when undergoing maintenance), alternative measures were used to prevent dusting from the trucks (e.g., inspections, handheld water sprayers, manual scraping, and use of brooms, as needed, to manually clean the trucks and wheels before they left the working face).

3. DAILY INSPECTION RESULTS

To assess the effectiveness of the standard CCR fugitive dust control procedures outlined above, daily inspections were conducted by a representative from Charah, Inc., the Site operators. The daily inspections results were recorded on weekly inspection logs for the reporting period (i.e., 1 November 2024 through 31 October 2025). Those results showed that fugitive CCR emissions were not observed during the inspections, which indicated that the standard dust control procedures were effective at controlling CCR dust emissions from the Site.

4. CITIZEN COMPLAINTS

No citizen complaints were logged during the reporting period.

5. CORRECTIVE MEASURES

Because the daily inspections indicated that fugitive dust emissions were not observed, corrective measures were not necessary during the reporting period.

6. FDCP REVIEW AND AMENDMENT

As required by the FDCP, Geosyntec reviewed the FDCP and Site conditions to assess if a plan amendment is needed to effectively control and monitor fugitive emissions of CCR dust from the Site. There were no changes in Site conditions that would substantially affect the FDCP. Therefore, an amendment to the FDCP is not required at this time.