

GAVIN POWER, LLC

A wholly owned subsidiary of
Lighstone Generation LLC



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

Gavin Power, LLC
7397 N St Rt #7
Cheshire, Ohio 45620

September 2020

Table of Contents

1.0 Introduction.....	1
2.0 Facility Description and Contact Information	1
2.1 Facility Information	1
2.2 Contact Information.....	1
2.3 Facility Description	2
3.0 Fugitive Dust Controls	3
4.0 Citizen Complaint Log	4
4.1 Plant Contacts	4
4.2 Follow-up	4
4.3 Corrective Actions and Documentation.....	4
5.0 Plan Assessment	5
6.0 Recordkeeping, Notification and Internet Requirements.....	5
6.1 Recordkeeping.....	5
6.2 Notification.....	5
6.3 Internet Site Requirements	5

1.0 INTRODUCTION

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

The Annual Report is deemed complete when it is placed in the facility's operating record as described in Section 6.0. The deadline for completing subsequent Annual Reports is one year after the date of completing the previous report. The previous annual report was added to the operating record on September 28, 2019. This annual report addresses the period from September 21, 2019 to September 21, 2020.

The Annual Report will be placed in the operating record and retained in the office of the Gavin Plant Environmental Process Owner (EPO). The Plan will also be placed on Gavin Plant's publicly accessible internet website titled "CCR Rule Compliance Data and Information" as described in Section 6.0.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

General Information:

Name of Facility: Gavin Power, LLC

Street: 7397 N St Rt #7

City: Cheshire State: Ohio ZIP Code: 45620

County: Gallia

Telephone Number: 740-925-3012

Latitude: 38° 56' 9" N Longitude: 82° 7' 6" W

2.2 Contact Information

Facility Operator:

Name: Gavin Power, LLC

Attention: Nicholas Tipple – Plant Manager

Address: 7397 N St Rt #7

City, State, Zip Code: Cheshire, Ohio 45620

Facility Owner:

Name: Lightstone Generation LLC
Attention: Laurie Jodziewicz
Address: 500 Alexander Park, Suite 300
City, State, Zip Code: Princeton, NJ 08540

Plan Contact:

Name: Taylor Huffman – Environmental Process Owner – Gavin Power, LLC
Address: 7397 N St Rt #7
City, State, Zip Code: Cheshire, Ohio 45620
Telephone Number: 740-925-3171
Email address: Taylor.Huffman@lightstonegen.com

2.3 Facility Description

The Gavin Power Plant is located on the shore of the Ohio River at Cheshire, Ohio, and consists of two electric generating units. Lightstone Generation owns Gavin's nominally rated 1300-megawatt Unit 1 and Unit 2. See the Plan for a further description of plant activities and fugitive dust controls.

3.0 FUGITIVE DUST CONTROLS

The following fugitive dust control measures were implemented during the period addressed by this Annual Report:

Plant Activity	Fugitive Dust Control Measures
Plant and Landfill Roadways	Roadways were watered or swept as needed and speed control measures were implemented; material carried off plant property and deposited onto public highways by vehicular traffic or erosion by water was removed and disposed of properly.
Landfill – unloading and placement of material	Unloading emissions were controlled by maintaining moisture in the material, taking precautionary measures (minimizing drop height) and watering as needed; spreading and compacting emissions were controlled by maintaining moisture in the material, and watering as needed.
Landfill – wind erosion	Wind erosion control measures for open areas included: precautionary measures such as minimizing the amount of open area and by placing cover and seeding; compacting material as it was unloaded; maintaining moisture content of the materials, and watering as needed.
Fly Ash Reservoir	Emissions were controlled by the inherent moisture of the material and maintaining water levels in the pond, as needed. Natural vegetation has developed and reestablished as new areas have been exposed.
Bottom Ash Pond	Emissions were controlled by the inherent moisture of the material, maintaining pile height, and timely loading of trucks; and watering as needed.

Note: Implementation of control measures will not be necessary for roadways that are covered with snow and/or ice or if sufficient precipitation occurs to minimize or eliminate fugitive dust. Implementation of any control measures may be suspended if unsafe or hazardous driving conditions would be created by its use.

4.0 CITIZEN COMPLAINT LOG

4.1 Plan Contacts

Generally, complaints made to the plant are by telephone and received by the EPO (Plan Contact). In the case of holiday, weekends, or other times when the EPO may not be onsite, the plant guard houses or plant general phone number may receive complaint information by telephone that is provided to the EPO at the earliest convenience. Complaints may also be made to Ohio EPA who in turn will contact the EPO.

No complaints were received by the Plant EPO during the period addressed by this Annual Report.

4.2 Follow-up

All complaints will be entered into a log by the EPO with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be followed up which may include: checking plant operations at the time of the event, reviewing inspection records, discussing with other plant personnel, reviewing weather data, collecting samples and contacting the person making the complaint to obtain additional information.

No complaint follow-up was necessary during the period addressed by this Annual Report.

4.3 Corrective Action and Documentation

Corrective actions will be taken as needed and documented. If it is determined that the Plan needs to be amended as a result of the corrective actions, it will be amended in accordance with the Plan. If possible, the EPO will follow-up with the complainant and/or Ohio EPA to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report.

No corrective actions due to complaints were necessary during the period addressed by this Annual Report.

5.0 PLAN ASSESSMENT

The Plan is periodically assessed to verify its effectiveness, and if necessary, amended.

The EPO reviewed the inspection records when preparing this Annual Report to assess the effectiveness of the Plan and determined that no additional or modified measures were warranted.

6.0 RECORDKEEPING, NOTIFICATION and INTERNET REQUIREMENTS

6.1 Recordkeeping

The Annual Report and the Plan (and any subsequent amendment of the plan) will be kept in the facility's operating record as they become available. The Plan and files of all related information will be maintained in a written operating record at the facility for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, record or study. Only the most recent Plan must be maintained in the record. Files may be maintained on a computer or storage system accessible by a computer. One recordkeeping system may be used for the CCR units if the system identifies each file by the name of each unit (i.e. FAP, BAP, or Landfill).

6.2 Notification

The Director of the Ohio EPA and Ohio EPA-SEDO will be notified within 30 days of when the Annual Report is placed in the operating record and on the publicly available internet site. This notification will be postmarked or sent by email before the close of business on the day the notification is required to be completed. If the notification deadline falls on a weekend or federal holiday, the notification is automatically extended to the next business day.

6.3 Internet Site Requirements

The most recent Annual Report will be placed on the facility's CCR website titled "CCR Rule Compliance Data and Information" (www.gavinpowerccr.com) within 30 days of placing it in the operating record.