FINAL - REVISION 4

Coal Combustion Residuals Fugitive Dust Control Plan

Prepared for

NV Energy

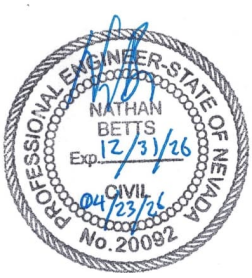
April 2026

JACOBS

1301 N Green Valley Parkway
Suite 200
Henderson, NV 89074

Certification and Change Record

I certify that that this Coal Combustion Residuals Fugitive Dust Control Plan for Reid Gardner Station meets the requirements set forth in Title 40 of the *Code of Federal Regulations*, Part 257.80(b).



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Revision Date	Certified By	Revision	Description of Changes
October 15, 2015	Jennifer Claghorn, PE / CH2M HILL	0	Initial Plan
April 17, 2017	Jennifer Claghorn, PE / CH2M HILL	1	Added Ponds B1, B2, B3 and E1 to address rule change Added change record Modified facility description and procedures to reflect Station retirement
July 23, 2019	Jennifer Claghorn, PE / Jacobs	2	Corrected SIC code Modified facility description to reflect completed pond closure actions
February 18, 2021	Jennifer Claghorn, PE / Jacobs	3	Updated to reflect operational changes as described in Revision 3.
April 23, 2026	Nathan Betts, PE / Jacobs	4	Updated to reflect operational changes for Mesa Ponds M5 and M7.

Contents

1 Facility and Owner Information

Facility Name	Reid Gardner Station
Facility Location	501 Wally Kay Way Moapa, Nevada 89025 (702) 449-9812
Owner	NV Energy 6226 W. Sahara Avenue Las Vegas, Nevada 89146-0001

2 Introduction

This Coal Combustion Residuals (CCR) *Fugitive Dust Control Plan* (plan) was developed to identify and describe procedures to minimize potential CCR fugitive dust emissions facility-wide at Reid Gardner Station (RGS), with specific attention given to CCR units and any other location where CCR management and material-handling activities might occur. The plan also includes:

- An explanation of how the measures selected are applicable and appropriate for site conditions
- Procedures to emplace CCR as conditioned CCR
- Procedures to log citizen complaints involving CCR fugitive dust events
- Procedures that are followed to periodically assess the effectiveness of the plan and amend the plan as needed

This plan was prepared and implemented in accordance with Title 40 of the *Code of Federal Regulations* Part 257.80 (40 CFR 257.80). In accordance with 40 CFR 257.80(d), this plan will be placed in the RGS operating record and on NV Energy's publicly accessible internet site.

3 CCR Fugitive Dust Control Measures

RGS is a former coal-fired, electric power generating station that retired the last of four units on March 22, 2017 (Standard Industrial Classification Category 4911). The Station has been decommissioned, and demolition was completed in 2020; thus, it is no longer generating electricity or producing new quantities of CCR.

The only operational CCR unit at RGS is the CCR landfill. The following sections describe the control measures that will be implemented at RGS to minimize fugitive dust from becoming airborne. Though these measures are organized by CCR units, most can be applied facility-wide.

3.1 CCR Surface Impoundments

RGS no longer has CCR surface impoundments that are subject to the requirements of 40 CFR 257.80 because the impoundments have been formally closed under 42 CFR 57.102 of the CCR Rule. This includes former Ponds 4B-1, 4B-2, 4B-3, and E-1, which were closed by removal in April 2019; and Ponds M5 and M7, which were closed by removal in Apil 2026.

3.2 CCR Landfill Dust Control Measures

The landfill on the mesa located southwest of the plant is also a CCR unit and is permitted as a Class III Landfill (Permit SW138REV00) with the Nevada Division of Environmental Protection, Bureau of Sustainable Materials Management. Fly ash, bottom ash and pond solids are the primary CCR solid wastes disposed of in this landfill, but the permit also allows for the disposal of other non-CCR solid wastes generated onsite. In addition to the landfill, the ash haul road leading to the landfill is subject to spillage and can be a potential CCR fugitive dust source.

Procedures used to control CCR fugitive dust in the landfill and haul road areas are discussed as follows.

The following general procedures will be implemented to control CCR fugitive dust at RGS:

- The potential to produce fugitive dust will be considered when selecting specific means, methods, and techniques to complete work.
- Dust palliatives may be applied on NV Energy-owned property. Only raw water and dust palliatives approved by the Bureau of Land Management can be used on Bureau of Land Management lands. When used, the palliative is mixed with water and sprayed from the trucks or trailers.
- Landfill, hauling, and other CCR management operations may be modified during periods of high wind or other unfavorable weather conditions.
- Operations may be temporarily limited if procedures fail to control dust.
- Good housekeeping will be practiced in the landfill, hauling roads, and other CCR management areas.

Handling and placement of CCR wastes at the RGS involve loading, unloading, and hauling of wastes that have the potential to produce CCR fugitive dust. The following procedures will be used to minimize CCR fugitive dust from waste handling and placement:

- CCR wastes will be moisture-conditioned as the trucks are loaded. Per 42 CFR 57.80(b)(2), conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust-suppression agent.

- Drop heights when loading, unloading, and/or handling materials will be minimized.
- When transporting dry or potentially dusty material that may release fugitive dust, haul vehicles will be driven at slower speeds or have loads covered with tarps or be moisture-conditioned.

Landfill work areas include working areas where active waste placement and cover activities are occurring. This activity involves earthmoving, loading and unloading of wastes and disturbing areas that have the potential to produce CCR fugitive dust. The following procedures will be used to minimize CCR fugitive dust from landfill work areas:

- Work areas will be limited in size to reduce the potential to generate dust. Generally, work area size will be limited to that necessary to safely and efficiently complete work. When conditions are favorable, the size of the work area, to include the working faces, may be increased.
- At the end of each day, a soil cover or alternative daily cover may be applied to the waste. The soil cover activities at the landfill include truck loading, cover dumping from the truck and cover spreading. The soil cover is generally obtained from a nearby borrow source. As an alternative to placing cover, the landfill may be operated on a continuous basis so that watering, material-handling equipment and personnel are onsite to control fugitive dust.
- Water may be actively applied to moisture-condition work areas to prevent the release of fugitive dust and promote compaction when needed. Water will be applied by water trucks equipped with pumps and sprayers (or similarly equipped water wagons or trailers). Employees or contracted staff may use hoses or water cannons to wet hard-to-reach areas.
    - At least one water truck will be available to serve the working faces and associated roads during routine landfill operations.
    - Additional water trucks, if needed, will be available to moisture-condition additional working faces, construction projects in the CCR landfill footprint (for example, stormwater system construction, cover maintenance, and final cover placement) and associated roads.
    - Watering will be limited to allow safer vehicle operation and reduce mud and runoff.

Haul roads to the landfill and within the landfill may be subject to spillage and can be a CCR fugitive dust source. The following procedures will be used to minimize CCR fugitive dust from haul roads:

- Water may be applied to moisture-condition roads to prevent the release of fugitive dust. Water will be applied by water trucks equipped with pumps and sprayers (or similarly equipped water wagons or trailers). Employees or contracted staff may use hoses or water cannons to wet hard-to-reach areas.
- The haul road surface will be bladed to remove accumulated spillage. The windrowed material will be picked up and disposed of in the onsite landfill.
- Traffic flows will be routed to reduce vehicle miles traveled and limit ground disturbance.
- Vehicle speed will be reduced or limited to reduce dust from vehicle operation.

Inactive landfill areas may be a source of CCR fugitive dust. The following procedures will be used to minimize CCR fugitive dust from inactive disturbed landfill areas and closed landfill areas:

- Continued vehicle travel will be prohibited on inactive landfill areas.
- Other erosion and dust control methods that will be used at inactive landfill areas may include cover with soil, palliative applications to form a visible surface crust, or revegetation. Only dust

palliatives approved by the Bureau of Land Management may be applied on land owned by the Bureau of Land Management.

Regular monitoring will be performed on activities with the potential to generate dust:

- Monitoring will be the responsibility of all RGS personnel.
- Waste handling, work areas, haul roads and other areas of disturbance will be inspected periodically.
- The effectiveness of dust-suppression procedures will be evaluated and documented based on periodic inspections.

4 Citizen Complaint Procedure

In accordance with the requirement of 40 CFR 257.80(b)(3), the following procedure will be used to log citizen complaints involving CCR fugitive dust events at RGS.

4.1 Purpose of Procedure

The purpose of the procedure is as follows:

- Ensure that complaints are documented and fully investigated.
- Ensure that complaints are resolved quickly.
- Describe how complaints are analyzed and preventive actions applied to prevent similar complaints in the future.

4.2 Definitions, Terms and Abbreviations

Complaint: RGS defines a complaint as a written or verbal expression of dissatisfaction with facility operating conditions resulting from CCR fugitive dust generation.

4.3 RGS Procedure

This section outlines the RGS complaint procedure.

4.3.1 Receiving Complaints

Where non-written complaints are made to a member of staff, in person or via the telephone, polite interaction is expected at all times.

All complaints, whether written or verbal, should be documented on the Citizen Complaint Form. The form should include the following information from the complaint: the nature of the complaint, the complainant's description of the problem and the contact information of the complainant.

4.3.2 Implementing Immediate Actions

After documenting information about the complaint, all Citizen Complaint Forms shall be given to the Operations Manager, who will contact the Plant Director and the Environmental Department.

Investigative and corrective actions will be implemented as soon as practicable after receiving a complaint.

All investigative and corrective actions should be documented on the Citizen Complaint Form.

4.3.3 Recording Complaint on Register

After documenting information about the complaint and the immediate investigative and corrective actions taken, all Citizen Complaint Forms shall be forwarded to the Operations and Environmental Departments.

A unique number will be assigned to each Citizen Complaint Form and information will be logged in the Citizen Complaint Register.

4.3.4 Reviewing and Additional Corrective Actions

A thorough review of the complaint and corrective actions taken will result in a determination if any additional remedial actions are necessary. The review will be carried out by interviewing any staff concerned and inspecting relevant operating, computer, manual and telephone records.

Additional corrective actions will be implemented, as necessary. Any additional corrective actions required will be detailed on the Citizen Complaint Register.

4.3.5 Analyzing Complaints and Preventive Action

The Citizens Complaint Register will be periodically reviewed to assess its effectiveness at addressing fugitive dust complaints.

4.3.6 Records Storage

The Citizen Complaint Register will be maintained electronically to allow for easy and immediate retrieval.

A record of all citizen complaints will be included in the annual CCR Fugitive Dust Control Report.

5 Plan Evaluation

Inspections of the facility, with special emphasis on CCR units and any other location where CCR management and material-handling activities might occur, as well as the fugitive dust control measures outlined in this plan will be used to assess the effectiveness of this plan, in accordance with 40 CFR 257.80(b)(4). The following procedure will be used to conduct and document the inspections.

5.1 Purpose of Procedure

The purpose of the procedure is to periodically assess the effectiveness of this plan. This procedure will also be used to document the actions taken by NV Energy to control CCR fugitive dust and the corrective measures taken, which are required to be summarized annually in the annual Dust Control Report required under 40 CFR 257.80(c).

5.2 Procedure

This section outlines the procedure.

5.2.1 Any Observations of CCR Fugitive Dust or Control Measure Failure

An individual who observes fugitive dust at any time from any CCR unit or failure of a control measure in this plan is to notify the Operations Manager, Plant Director, or the Environmental Department. If possible, the issue should be resolved immediately.

Personnel receiving notification of fugitive dust from a CCR unit or failure of a control measure in this plan are expected to implement mitigating actions as soon as practicable.

5.2.2 Periodic Inspections

Periodic inspections of the RGS CCR units for fugitive dust and condition or status of control measures outlined in this plan will be conducted during daylight hours. The periodic inspections will be documented on a CCR Unit Inspection Form.

The plan will be updated as necessary based on the periodic inspection results.

5.2.3 Annual CCR Fugitive Dust Control Report (40 CFR 257.80(c))

An annual CCR Fugitive Dust Control Report will be prepared and will contain a description of the actions taken by NV Energy to control CCR fugitive dust, a record of all citizen complaints and a summary of any corrective measures taken.

Preparation of the annual CCR Fugitive Dust Control Report will consist of a review of the periodic CCR unit inspection forms, Citizen Compliant Forms and any other documentation concerning fugitive dust from CCR units, such as notices from any regulatory agency generated during the year preceding the report.

The initial annual CCR Fugitive Dust Control Report was completed no later than 14 months after placing the initial CCR Fugitive Dust Control Plan in the RGS operating record. The deadline for completing subsequent annual CCR Fugitive Dust Control Reports is 1 year after the date of completing the previous annual CCR Fugitive Dust Control Report.

A copy of the annual CCR Fugitive Dust Control Report will be placed in the RGS CCR operating record and on the NV Energy publicly accessible CCR internet site.

6 Amendments to Plan (40 CFR 257.80(b)(6 and 7))

This plan may be amended at any time. In addition, this plan will be amended whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

Once amended, the revised plan will be certified by a qualified professional engineer, and the revised plan will be placed in the RGS operating record and posted on the NV Energy publicly accessible internet site.