COAL COMBUSTION RESIDUAL (CCR)
FUGITIVE DUST CONTROL PLAN

Plant Miller
October 2015

Professional Engineer Certification:

Based upon my knowledge, information, and belief that the content in the attached Fugitive Dust Control Plan is accurate, I hereby certify that this Fugitive Dust Control Plan meets the requirements of 40 CFR § 257.80(b)(1)-(7) (Coal Combustion Residuals Rule).

Wyman Turner, PE No. 30102, 12-31-15 Date: 10-08-15

Name, P.E. License No., Expiration Date

Wyman Turner
Signature

AMENDMENT SUMMARY

Date	Amendment #	Comments / Notes

1.0 PURPOSE

The purpose of this guideline is to demonstrate compliance with the fugitive dust requirements in 40 CFR § 257.80(a) and 257.80 (b)(1) through (7).

2.0 SCOPE

This fugitive dust plan identifies and describes the Coal Combustion Residuals (CCR) fugitive dust control measures that Plant Miller will use to minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. Coal combustion residuals are generated from the burning of coal to produce electricity and are defined as fly ash, bottom ash, boiler slag, and flue gas desulfurization (FGD) materials.

3.0 REFERENCES

40 CFR §§ 257.53, 257.80, 257.105(g)(2)

4.0 GENERAL INFORMATION

EPA defines fugitive dust as “solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than through a stack, or chimney.” 40 CFR § 257.53.

5.0 PROCESSES

1) Identify the CCR units on plant site that are subject to the requirements in §257.80 to minimize CCR from becoming airborne.

CCR units include:
- Ash Pond

2) Identify and describe the fugitive dust control measures that are applicable and appropriate to minimize CCR from becoming airborne at the units listed in Section 5.0 (1) of this plan.

Fugitive dust control measures include:
1. CCR conveyance, storage and loading systems are closed systems for those CCR materials that are likely to generate fugitive dust emissions. The closed systems minimize dust emissions.
2. CCR is transported moist to the Ash Pond.
3. Roads at the Ash Pond are regularly wetted to minimize dust generation.
4. Vehicle speed through active working areas is reduced.
5. Water and/or dust suppressants are sprayed as needed during placement, spreading, and compaction of CCR materials in the Ash Pond to control dust.
6. Water is sprayed on any areas of the Ash Pond where routine inspections indicate that additional dust control is necessary.
7. Areas in the wet portion of the pond include vegetation to control erosion and minimize dust.

3) Explain how the control measures described in Section 5.0 (1) of this plan are applicable and appropriate for site conditions related to each CCR unit.

The fugitive dust control measures identified and described in this plan were adopted and implemented based upon an evaluation of site-specific conditions, engineering site visits and subject matter expert input. Conditioning CCR where needed, containing CCR where appropriate, controlling access to CCR areas, and inspecting CCR areas in the manner described in Section 5.0 (2) are determined to be applicable and appropriate dust control measures for the listed CCR units. The evaluation included assessing the effectiveness of the fugitive dust control measures for each CCR unit. Consideration was given to various factors such as site conditions, weather conditions, moisture content and physical condition of the CCR, as well as operating conditions within the CCR units.

4) Describe the process to emplace CCR as conditioned CCR for any CCR landfill listed in Section 5.0 (1) of this plan.

This plant does not operate any dry CCR landfills. Measures to address dry areas within the pond are described in Section 5.0 (2).

5) Describe the fugitive dust control measures to minimize CCR from becoming airborne on roads and at other CCR management and material handling activities.

CCR material is largely managed in closed systems that do not generate fugitive dust. CCR is transported moist to the Ash Pond. Dust accumulation and generation is further minimized by washing down work areas and reducing vehicle speed in active work areas.

See discussion of CCR unit in Section 5.0 item 2) of this plan.

6) Describe the process to periodically assess the effectiveness of the fugitive dust control measures described in this plan.

Plant personnel will perform periodic CCR fugitive dust inspections. Based on these observations, the frequency, location and amount of dust suppression activities and processes will be adjusted to minimize dust emissions. Plant personnel understand the importance of minimizing CCR fugitive dust generation and the requirement that any CCR fugitive dust observations should be promptly addressed.

7) Describe the process to log citizen complaints received involving CCR fugitive dust events at the facility.

When a complaint is received regarding a CCR fugitive dust event at the facility, the complaint is documented and investigated. Appropriate steps are taken including any appropriate action, if needed.