

## COAL COMBUSTION RESIDUALS RULE

### Fugitive Dust Control Plan

Plant Red Hills  
10/06/2015

Plant Contact

Jim Ward  
Jim Ward, Compliance Specialist

Date: 10/07/2015

Plant Manager:

Keith J. Cuevas  
Keith Cuevas, Plant Manager

Date: 10/08/2015

Environmental Affairs Contact:

Charles Blount  
Charles Blount, Engineer

Date: October 6, 2015

#### Professional Engineer Certification:

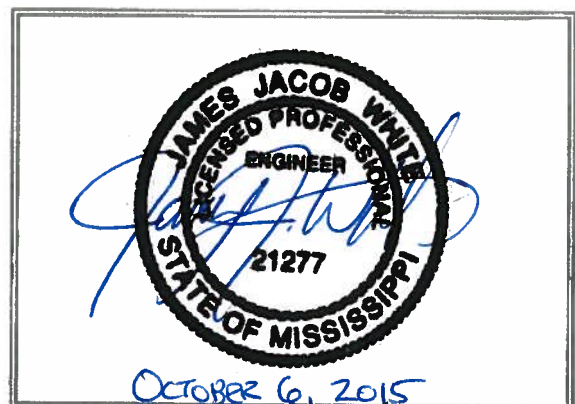
40 CFR § 257.80(b)(7) states that "The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment, meets the requirements of this section." For purposes of this certification, the "Section" referred to is considered as 40 CFR § 257.80(b).

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

James J. White  
Name

MS License No. 21277  
P.E. License No. and State of Licensure

December 31, 2016  
License Expiration Date



Seal, Signature, and Date (Certification)

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## AMENDMENT SUMMARY

Date	Amendment #	Comments / Notes
10/6/2015	Final	Final Dust Plan

## 1.0 PURPOSE

The purpose of this guideline is to demonstrate compliance with the fugitive dust requirements in 40 CFR § 257.80 (b)(1) through (7) of the Coal Combustion Residuals Final Rule. See 80 Fed. Reg. 21,302 (April 17, 2015).

## 2.0 SCOPE

This fugitive dust plan identifies and describes the Coal Combustion Residuals (CCR) fugitive dust control measures that Plant Red Hills 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 and bottom ash.

## 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 PROCEDURES

- 1) Identify the CCR units on plant site that are subject to the requirements in §257.80 to minimize CCR from becoming airborne. This should include all applicable CCR landfills, CCR surface impoundments, or any lateral expansion of a CCR unit.

1. Red Hills - Ash Management Unit (AMU)
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- 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. This may include, for example, wet suppression using water or a chemical dust suppressant; locating CCR inside an enclosure or partial enclosure; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative cover; reducing or halting certain operations during high wind events (if possible), or applying a daily cover. For the purposes of this plan, wet suppression includes the use of water-spray equipment such as hoses, sprinklers, spray bars, water cannons, water trucks, or any other means of spraying or applying water, and may include the use of surfactants, wetting agents, or other additives.

Wetting of ash (30% moisture) prior to loading in transfer trucks Wet suppression utilizing water truck Wet suppression utilizing sprinkler system
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- 3) Explain how the control measures described in Section 5.0 of this plan are applicable and appropriate for 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 and are determined to be applicable and appropriate for the listed CCR units. The evaluation included assessing the effectiveness of the fugitive dust control measures for the CCR unit at the facility over time taking into consideration various factors such as site conditions, weather conditions, and operating conditions.

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

1. Batch mixing with water (30% moisture) at the ash silos

- 5) Describe the fugitive dust control measures to minimize CCR from becoming airborne on roads and at other CCR management and material handling activities. This may include, for example, reducing vehicle speed limits; paving, wetting, or sweeping roads; covering trucks that transport CCR, or any of the control measures listed in Section 5.0 (2) of this plan.

Reduced speed limits, paved roads, road wetting, and covered trucks are all utilized to minimize fugitive dust.

- 6) Describe the procedures to periodically assess the effectiveness of the fugitive dust control measures described in this plan. This may include, for example, visual observations, inspections, written logs, etc.

Periodic inspections and visual observations are performed by plant personnel and facility operators.

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

See Appendix A

## **APPENDIX A**

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## **COAL COMBUSTION RESIDUALS RULE**

### **Citizen Complaint Procedure**

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#### **1.0 PURPOSE**

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The purpose of this guideline is to demonstrate compliance with the fugitive dust requirements in 40 CFR § 257.80 (b)(3) of the Coal Combustion Residuals Final Rule. See 80 Fed. Reg. 21,302 (April 17, 2015).

#### **2.0 SCOPE**

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This procedure describes the actions that Plant Red Hills will take to log citizen complaints involving fugitive dust from coal combustion products generated at the facility.

#### **3.0 REFERENCES**

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

#### **4.0 GENERAL INFORMATION**

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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 PROCEDURES**

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See Appendix B

## **APPENDIX B**

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## **Procedure to Log Citizen Complaints involving CCR Fugitive Dust Events Plant Red Hills**

This procedure is to be distributed to any employee or department within Red Hills Power Plant that could receive a citizen complaint involving CCR Fugitive Dust at Plant Red Hills.

1. When a citizen complaint is received involving potential CCR fugitive dust events by a Red Hills employee, the employee should record the relevant information on the internal Citizen Complaint Documentation Form. (See attached)
  2. The Red Hills employee should then forward a copy of the Citizen Complaint Documentation Form to MPC Environmental Affairs by the end of the next business day following the receipt of the complaint. The form should be emailed or faxed. The Red Hills employee may keep a copy of the form in their files, but is not required.
  3. MPC Environmental Affairs will contact the Red Hills employee that received the citizen complaint and ask any relevant follow-up questions, including any corrective actions that were taken. A designated representative from Environmental Affairs will then record the complaint in the Operating Record.
  4. MPC Environmental Affairs will follow-up with the necessary departments to ensure corrective actions have been taken and attach a summary of the resolutions to the complaint.
  5. MPC Environmental Affairs will prepare and submit the CCR Fugitive Dust Annual Report, including all citizen complaints regarding CCR Fugitive dust for the annual reporting period, and a copy will be retained in the compliance files.
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## CITIZEN COMPLAINT DOCUMENTATION FORM

This form should be completed by the Red Hills employee that receives a fugitive dust related complaint from a citizen concerning Plant Red Hills.

**Date of Complaint:** \_\_\_\_\_ **Time of Complaint:** \_\_\_\_\_

**Description of Complaint:** [Include details provided by the complainant<sup>1</sup>, time and location of occurrence or event, any requests by the complainant, etc.]

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**Name of Complainant:** \_\_\_\_\_ **Phone Number:** \_\_\_\_\_

**Address** (if complaint concerns personal residence): \_\_\_\_\_

**Plant Red Hills Employee Name, Title, Department, Phone Number who received complaint:**

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**Please provide a copy of this form to the Environmental Affairs Department by the close of the next business day following the complaint.**

**Completed by Environmental Affairs Department:**

**Received by** \_\_\_\_\_

**Name**

**Date**

**Resolution:**

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<sup>1</sup> A complainant is the person making the complaint.