

COAL COMBUSTION RESIDUAL (CCR) FUGITIVE DUST CONTROL PLAN (Amended)

Plant Greene County
October 2020

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); ADEM Admin. Code r. 335-13-15-.05(1)(b)1.-7. (Coal Combustion Residuals Rule).


James C. Pegues, P.E., D.3E Licensed AL 16516



Date: 10/13/2020

AMENDMENT SUMMARY

Date	Amendment #	Comments / Notes
10/13/2020	1	Amended to address Ash Pond closure construction activities

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); ADEM Admin. Code r. 335-13-15.05(1)(b)1.-7.

2.0 SCOPE

This fugitive dust plan identifies and describes the Coal Combustion Residuals (CCR) fugitive dust control measures that Greene County Steam Plant 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); ADEM Admin. Code rr. 335-13-15-.02, 335-13-15-.05(1), 335-13-15-.08(1)(g)2.

4.0 GENERAL INFORMATION

EPA and ADEM define “CCR 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; ADEM Admin. Code r. 335-13-15-.02(11).

5.0 PROCESSES

- 1) Identify the CCR units on plant site that are subject to the requirements in § 257.80; r. 335-13-15-.05(1) to minimize CCR from becoming airborne.

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| <ul style="list-style-type: none">• Ash Pond |
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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.

Ash Pond

The Ash Pond is currently undergoing closure in place. Fugitive dust control measures in the ash pond area include the following:

1. Access to the CCR unit will be restricted, allowing only necessary personnel to conduct closure construction activities, groundwater monitoring, and inspections. This will minimize the disturbance of unpaved access roads and exposed ash areas, and will limit potential sources of fugitive dust.
2. Ash will be handled moist or wet during movement and placement.
3. Routine inspections by plant and construction personnel for fugitive dust will be completed
4. Areas with observed fugitive dust will be sprayed with water using water truck or other means approved by plant personnel.
5. Vehicle speed will be limited. A speed limit sign will be posted at each access road entrance to the CCR unit.
6. Contractors involved with moving or disturbing CCR will follow dust control measures approved by plant personnel.
7. Disturbed areas in the Ash Pond are minimized to the extent possible 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 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. Handling ash moist, controlling access to CCR areas, reducing vehicle speeds, 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 unit.

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

The 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.

Any accumulation of CCR material or dust generation within the CCR unit, construction areas, and along CCR transport routes is promptly addressed to control fugitive dust. CCR materials will be wetted with water using a water truck or other methods as needed or may be flushed to wet sumps or transported directly to the settling ponds to prevent releases of fugitive dust.

See discussion of ash pond CCR unit in Section 5.0 (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 perform routine fugitive dust inspections and oversee the operation of the water truck, or other dust suppression activities as necessary to control fugitive dust. Plant personnel understand the importance of minimizing CCR fugitive dust generation and the requirement that any CCR fugitive dust observations are 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.