



Fugitive Dust Control Plan

Richmond Power and Light
Whitewater Valley Generating Station
Richmond, Indiana

GAI Project Number: C151119.07, Task 002
April 2017



Prepared by: GAI Consultants, Inc.
Pittsburgh Office
385 East Waterfront Drive
Homestead, Pennsylvania 15120-5005

Prepared for: Richmond Power and Light
2000 US 27 South
Richmond, Indiana 47374

Fugitive Dust Control Plan

Richmond Power and Light
Whitewater Valley Generating Station
Richmond, Indiana

GAI Project Number: C151119.07, Task 002

April 2017

Prepared for:
Richmond Power and Light
2000 US 27 South
Richmond, Indiana 47374

Prepared by:
GAI Consultants, Inc.
Pittsburgh Office
385 East Waterfront Drive
Homestead, Pennsylvania 15120-5005

Table of Contents

1.0	Plan Overview	1
1.1	Initial CCR Fugitive Dust Control Plan	1
1.2	Plan Amendment	1
1.3	Annual CCR Fugitive Dust Control Report	1
2.0	Initial CCR Fugitive Dust Control Plan	1
2.1	Dust Control During Pond Clean-out.....	1
2.1.1	Water Addition/Spray	2
2.1.2	Wind Restrictions	2
2.2	Dust Control During Transport	2
2.2.1	Tarps	2
2.2.2	Water/Chemical Dust Suppressants.....	2
2.3	Citizens Complaint Log	2
3.0	Plan Effectiveness Assessment	2
4.0	Plan Amendment.....	3
5.0	Annual CCR Fugitive Dust Control Report	3
6.0	References.....	4
Appendix A Citizen’s Complaint Log		

© 2017 GAI Consultants, Inc.

Certification/Statement of Professional Opinion

The Fugitive Dust Control Plan (Plan) for the Surface Impoundment at the Whitewater Valley Generating Station was prepared by GAI Consultants, Inc. (GAI). It is my professional opinion as a Professional Engineer licensed in the State of Indiana that the Plan has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, and at the same time and in the same locale. It is my professional opinion that the Plan was prepared consistent with the requirements of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion, and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.



Seal

April 14, 2017
Date

1.0 Plan Overview

This Fugitive Dust Control Plan (FDCP) sets forth the techniques that will be utilized to control dust emissions during loading, transportation, and placement of Coal Combustion Residuals (CCR) at the Whitewater Valley Generating Station (Station) in Richmond, Indiana.

The purpose of this FDCP document is to provide provisions to minimize and/or avoid potential adverse environmental impacts due to the transportation and placement of CCR. This document was prepared in accordance with the United States Environmental Protection Agency Title 40 of the Code of Federal Regulations Parts 257 and 261; Hazardous and Solid Waste Management Disposal System and Disposal of Coal Combustion Residual from Electric Utilities, Final Rule April 17, 2015; and the United States Environmental Protection Agency Title 40 of the Code of Federal Regulations Part 257; Hazardous and Solid Waste Management Disposal System and Disposal of Coal Combustion Residuals from Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur, Final Rule October 4, 2016.

1.1 Initial CCR Fugitive Dust Control Plan

The Initial CCR FDCP for an inactive surface impoundment must be submitted no later than April 18, 2017 for existing facilities [257.100(e)(4)(i)]. The initial FDCP must include a discussion of the proposed methods for control/mitigation of fugitive dust at the Station [257.80(b)(1)], such as during loading, transport, and placement of CCRs, and during daily and long-term operation of the CCR unit (Surface Impoundment). Any citizen complaint shall be placed on a log [257.80(b)(3)] for inclusion in the annual dust control report. The initial plan must be included into the facilities operating record [257.105(g)(1)].

1.2 Plan Amendment

The initial FDCP can be amended [257.80(b)(6)] at any time, and must be amended whenever there is a change in conditions that would substantially affect the written plan in effect, such as construction and operation of a new CCR unit or change in operation of an existing CCR unit. The amended FDCP(s) must be included into the facilities operating record [257.105(g)(1)].

1.3 Annual CCR Fugitive Dust Control Report

An Annual CCR Fugitive Dust Control Report [(FDCR) 257.80(c)] shall be developed, detailing a description of activities taken by the owner or operator to control CCR fugitive dust; a record of all citizen complaints; and a summary of any corrective measures taken, will be created. The initial FDCR shall be completed no later than 14 months after placing the initial FDCP in the facility's operating record. Each subsequent report must be completed one year after the date of completing the previous report [257.80(c)]. The FDCR must be included into the facility's operating record [257.105(g)(2)].

2.0 Initial CCR Fugitive Dust Control Plan

Section 257.80 and 257.100 of the regulations requires the owner or operator of a CCR facility to submit a FDCP and requires that the plan identify the fugitive dust control measures the owner and/or operator will use to minimize CCR from becoming airborne at the facility.

2.1 Dust Control During Grading Activities Within the Surface Impoundment

CCR material is stored in the Station Surface Impoundment. Potential dust control measures which could be utilized during Surface Impoundment clean-out include the addition/spraying of water or the prohibition of material loading during excessively high (>10 MPH) winds. Pond clean-out is not a normal site activity.

2.1.1 Water Addition/Spray

Much of the CCR in the Surface Impoundment is in a dry condition. Water could be added to the CCR prior to clean-out activities to mitigate dust generation during truck loading. Monitoring would be required to ensure that excessive water is not added to the CCR prior to placement into the transport vehicles. Monitoring would also be required to ensure that the CCR remains in a transportable condition, such as not excessively wet or saturated. The quantity of water required would need to be monitored and based on atmospheric and field conditions on the day of loading.

2.1.2 Wind Restrictions

The use of wind restrictions may impact facility operations, whereas during excessive wind events (>10 MPH), CCR would not be loaded into transport vehicles.

2.2 Dust Control During Transport

Potential dust control methods which could be utilized during CCR transport include outfitting transport trucks with tarps, and the application of water or chemical dust suppressants to roadways, including transport and disposal facility roads.

2.2.1 Tarps

Automatic or manual tarps could be added to transport vehicles to help mitigate fugitive dust during CCR transport. Manual tarps would require the truck driver to exit the vehicle upon completion of loading of the CCR to install the tarp. An automatic tarp could be activated from the interior of the cab. Both manual and automatic tarps would require periodic maintenance and replacement.

2.2.2 Water/Chemical Dust Suppressants

Application of water or chemical dust suppressants would require the use of a separate vehicle, which depending on the number of applications required, could require additional manpower to perform. Application of water or chemical suppressants would be weather dependent and would need to be based on the amount of vehicle traffic anticipated for each day of CCR transport.

2.3 General Dust Control

In periods where no activities are occurring at the Surface Impoundment and dust is generated by wind and/or dry conditions, water could be applied to the CCR to mitigate dust generation.

2.4 Citizens Complaint Log

A log will be completed to document information regarding any citizen complaints received by the owner or operator of the CCR Facility. The citizen's complaint log shall be completed within 24 hours of receiving the complaint. The log form to be completed is provided in Appendix A.

3.0 Plan Effectiveness Assessment

The FDCP will be reviewed and the effectiveness will be assessed [257.80(b)(4)] at a minimum frequency of once per calendar year. The procedures for assessing the effectiveness will include the following:

- ▶ review 7-day monitoring checklists;
- ▶ review complaint log; and

- ▶ inclusion into the written plan of any lessons learned during the previous year's CCR operations.

4.0 Plan Amendment

The initial FDCP shall be modified [257.80(b)(6)] anytime there is a change in conditions such as operation of a new CCR unit, modification to the operations of the existing unit, or modification to the unit's features. The FDCP amendment shall provide specific details of the change in conditions, such as the size of a new unit. The amended FDCP shall be placed within the facility's operating record [257.105(g)(1)].

5.0 Annual CCR Fugitive Dust Control Report

The owner or operator of the CCR must prepare an annual CCR FDCR [257.80(c)]. The FDCR shall include a description of the actions taken by the owner or operator to control fugitive CCR dust, a record of all citizen complaints, and a summary of any corrective action taken. The FDCR shall be completed within one year of previous report's completion. The FDCR shall be placed in the facility operating record [257.105(g)(2)]. The initial FDCR must be completed within 14 months of the facility's initial FDCP.

6.0 References

The United States Environmental Protection Agency *Title 40 Code of Federal Regulations Parts 257 and 261; Hazardous and Solid Waste Management Disposal System and Disposal of Coal Combustion Residuals from Electric Utilities*, Final Rule April 17, 2015.

The United States Environmental Protection Agency *Title 40 Code of Federal Regulations Part 257; Hazardous and Solid Waste Management Disposal System and Disposal of Coal Combustion Residuals from Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur*, Final Rule October 4, 2016.

APPENDIX A

Citizen's Complaint Log

Fugitive Dust Citizen Complaint Log
Whitewater Valley Generation Station

Date: _____

Time: _____

Owner or Operator Representative in Receipt of a Citizen Complaint:

Title: _____

Address: _____

Phone: _____

Name of Person Filing Complaint: _____

Contact Information: _____

Location Description: _____

Complaint: _____

Immediate Corrective Action(s) Taken (if any): _____