

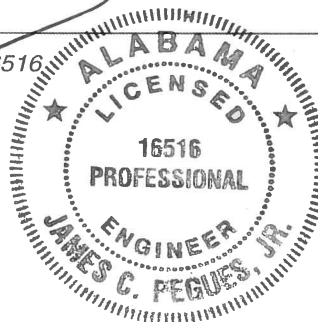
COAL COMBUSTION RESIDUAL (CCR) FUGITIVE DUST CONTROL PLAN

Plant Gadsden
April 2017

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).


James C. Pegues, PE AL 16516



Date: 4/10/2017

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 Alabama Power Plant Gadsden 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. Plant Gadsden no longer produces any CCR and the Plant Gadsden CCR Unit is in the process of closing.

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.

- 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.

Ash Pond

Fugitive dust control measures in the ash pond area include the following:

1. Plant personnel will perform routine inspection for fugitive dust. Water trucks or other means will be used to address fugitive dust if it is observed.
2. Sprinklers and water trucks are used to moisten the CCR as needed to prevent the generation of fugitive dust.
3. Vehicle traffic in the ash pond is restricted and vehicle speed is reduced to prevent the generation of fugitive dust.
4. Access to the CCR unit is restricted, allowing only necessary personnel to conduct ash management, inspections, and closure activities.
5. Contractors involved with moving or disturbing CCR will follow dust control measures approved by plant personnel.

- 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. 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 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.

Ash Pond :

No CCR is being placed in the Ash Pond as the plant is no longer burning coal..

- 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 and along CCR transport routes is promptly addressed to control fugitive dust. CCR materials are wetted with water using a water truck or other methods as needed,

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.