## CCR FUGITIVE DUST CONTROL PLAN WESTON GENERATING STATION

#### 1.0 INTRODUCTION

This fugitive dust control plan has been prepared to meet the requirements of 40 CFR 257.80(b).

This plan applies to the following coal combustion residuals (CCR) units at the Weston Generating Station (Facility):

### CCR Surface Impoundments <sup>1</sup>(Impoundments)

North Primary South Primary Northeast Secondary Southeast Secondary

### 2.0 FUGITIVE DUST CONTROL MEASURES

<u>CCR Management:</u> CCR generated at the Facility is conditioned with water at the source prior to transporting unless it is loaded into pneumatic tanker trucks. Water is added to the CCR at the source in sufficient quantities such that the CCR is not dusty during transport within the Facility. Conditioning CCR with water is a proven and effective measure to minimize the generation of fugitive dust emissions.

CCR removed from the Impoundments will be allowed to dewater prior to transport within the Facility.

Application of water, wet suppression spray, surface stabilizing agent, and/or cover material(s) as needed, will be used to prevent temporally stored CCR from becoming airborne. Grooming, compaction and hydraulic curing of CCR (some CCR reacts with water to form a hardened hydration product) may also be used to mitigate fugitive dust.

Hauling CCR offsite requires trucks to be covered prior to leaving the Facility and the CCR does not contain free water. The trucks are required to adhere to the speed limits posted on site to minimize fugitive dust emissions.

The wetting of the CCR to prevent it from becoming airborne and covering the trucks transporting material offsite are appropriate, proven and effective measures to minimize the generation of fugitive dust emissions.

<u>Haul Roads:</u> Major haul roads are paved, where possible, to minimize CCR fugitive dust emissions. In the event there is CCR residue on the paved roadway contributing to fugitive emissions, the roadway is wetted down using water. Unpaved sections of the haul roads will be wetted down using water. Where necessary, stone tracking pads, wash areas or cattle guard grating are used to help remove CCR from truck tires.

<sup>&</sup>lt;sup>1</sup> "CCR Surface Impoundment" is defined at 40 CFR 257.53.

# CCR FUGITIVE DUST CONTROL PLAN WESTON GENERATING STATION

During CCR hauling events, all paved plant haul roads are vacuum swept daily, at a minimum, except when weather conditions (e.g. rainfall/precipitation events and/or ambient temperatures) prevent vacuum sweeping effectiveness or act as a control for fugitive dust.

The above measures are all appropriate, proven and effective measures to minimize the generation of fugitive dust emissions.

#### 3.0 CITIZEN COMPLAINTS

Citizen complaints involving CCR fugitive dust events at the Facility will be routed to the Plant Environmental Manager for the Weston Generating Station. Citizen complaints are generally received by the Wisconsin Public Service Corporation Call Center at (800) 450-7260, but may also be received by the Control Room or Media Relations. The Plant Environmental Manager will prepare a complaint summary including information provided by the citizen (such as name, date, time, nature of complaint), a summary of conversations with the citizen and a summary of any actions taken to address the citizen complaint. Complaint summaries will be included in the annual fugitive dust control report as required by 40 CFR 257.80(c).

### 4.0 ASSESSMENT OF FUGITIVE DUST CONTROL PLAN

The fugitive CCR dust control measures outlined in this plan were developed as part of the Air Pollution Control Operation Permit and Wis. Adm. Code NR 415.04 and NR 445.10. These fugitive dust control measures have been in effect for years and have been effective in minimizing the generation of airborne dust at the facility. The continuing effectiveness this fugitive dust control plan will be evaluated by the Plant Environmental Manager during the preparation of the annual CCR fugitive dust report required by 40 CFR 257.80(c) by auditing the fugitive dust control measures outlined in Section 2.0 and after citizen complaints are received. After an audit or complaint, the Plant Environmental Manager will document any fugitive CCR dust issues. Modifications to this plan will be made on an as needed basis to address any deficiencies. Amendment of the plan will occur any time there is a change of conditions or CCR handling procedures that substantially affect the content of this written plan.

### 5.0 CERTIFICATION

To meet the requirements of 40 CFR 257.80(b)(7), I Mark W. Loerop hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR 257.80.

MARK W.
LOEROP
E-43783-6
NAPERVILLE
IL

Name: MARIC Corner

Date: 04 13 2015