santee cooper®

Fugitive Dust Control Plan

for compliance with

40 CFR 257: Legacy Coal Combustion Residual (CCR) Surface Impoundments

Legacy CCR Unit:

(located at Jefferies Generating Station)

Ash Pond A

FUGITIVE DUST CONTROL PLAN REVISION COPY AND CONTROL		
Revision Number	**Revision Date**	**Description**
0	09/2024	Original to meet the requirements of 40 CFR 257 Legacy Coal Combustion Residuals (CCR) Rulemaking.
1	09/2026	Updated PE Certification page.

Distribution List	
Santee Cooper Air Quality	Electronic Copy
Jefferies Generating Station	Electronic Copy

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PROFESSIONAL ENGINEER CERTIFICATION

In accordance with 40 CFR 257.80(b)(7), "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 of it, meets the requirements of this section."

I hereby certify and attest, having examined the facility and being familiar with the provisions of 40 CFR 257, that this Plan has been prepared in accordance with good engineering practices.

Signature of Registered Engineer: Susan K Gately

Printed Name of Registered Engineer: Susan K Gately

Registration Number: 44819

State of South Carolina

Date: 09-01-2026

SEAL

SECTION 1: INTRODUCTION

The Legacy Coal Combustion Residual Impoundment (Legacy Unit) located at Jefferies Generating Station (JGS) is subject to 40 CFR 257 Subpart D - Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments. The Legacy Unit at JGS has been identified as Ash Pond A. The Legacy Unit is described in further detail in Section 2. Per § 257.80 of this regulation, the owner or operator of the Legacy Unit is required to adopt measures that effectively minimize CCR from becoming airborne at the facility, and prepare and operate in accordance with a CCR Fugitive Dust Control Plan as specified below:

(1) The CCR Fugitive Dust Control Plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR Fugitive Dust Control Plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions.

(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR Fugitive Dust Control Plan must include procedures to emplace CCR as conditioned CCR. 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.

(3) The CCR Fugitive Dust Control Plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

(4) The CCR Fugitive Dust Control Plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

(5) The owner or operator of a CCR unit must prepare an initial CCR Fugitive Dust Control Plan for the facility no later than November 8, 2024, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after November 8, 2024 The owner or operator has completed the initial CCR Fugitive Dust Control Plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(1).

(6) The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR Fugitive Dust Control Plan at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

(7) 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 of it, meets the requirements of this section.

SECTION 2: FUGITIVE DUST SOURCES AND CONTROL MEASURES

The one (1) Legacy Unit identified in Table 1 (below) generates fugitive emissions from excavating, screening, wind erosion, temporary stockpiling, and hauling. See Appendix 1 for a site map detailing the JGS Legacy Unit.

CCR UNIT 1: ASH POND A

CCR material is currently being reclaimed from Ash Pond A by screening and piling excavated material into stockpiles. The stockpiled material is then loaded into haul trucks and transported to cement companies for beneficial use or an off-site Class 3 landfill.

GENERAL OPERATIONS

JGS employs work practices to reduce the generation of fugitive dust at Ash Pond A. On high wind days, excavating and screening in the Legacy Unit is reduced to limit the amount of fugitive dust generated. Because haul trucks travel only short distances (approximately 0.18 miles) on unpaved roads, the generation of fugitive dust is greatly diminished and kept to a minimum by evaluating the magnitude of wind during operations and by adhering to the facility's speed limit of 15 miles per hour. Visual observations are conducted to determine if excess dust is visible. If so, JGS personnel will take action to cease operations during periods of high wind. This is the most common and practical method of fugitive dust control for this unit.

TABLE 1: LIST OF CCR UNITS

Unit #	Legacy Unit	Potential Sources of Fugitive Dust	Control Measures	Explanation of Applicable and Appropriate Control Measures
1	Ash Pond A	Excavating, Wind Erosion, Haul Roads	Halt operations on windy days.	CCR material is being excavated, screened, piled, and hauled from Ash Pond A. There is little potential for fugitive emissions due to the moisture content of the pond. If CCR material is being excavated for beneficial reuse, that material is temporarily stockpiled. On windy days, plant staff make daily determinations to halt operations, if needed.

SECTION 3: CITIZEN COMPLAINT PROCEDURES

In accordance with 40 CFR 257.80(b)(3), "The CCR Fugitive Dust Control Plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility."

All citizen complaints pertaining to CCR fugitive dust events received by Santee Cooper employees should be directed to Environmental Services to be handled in accordance with the Corporate Environmental Incident Policy. In addition, citizen complaints pertaining to CCR fugitive dust events may also be reported via Santee Cooper's Anonymous Hotline. This hotline is available to Santee Cooper employees, Santee Cooper customers, and members of the

public by calling 888-350-0003. Reporting is available seven (7) days per week, 24 hours per day. The Anonymous Hotline Review Committee will communicate all complaints associated with fugitive dust emissions to the appropriate Santee Cooper personnel. All citizen complaints received by Santee Cooper involving CCR fugitive dust events at the facility will be summarized in the Annual CCR Fugitive Dust Report and include any corrective measures taken.

SECTION 4: PERIODIC EFFECTIVENESS ASSESSMENT

ROUTINE OPERATIONAL ASSESSMENTS

JGS personnel perform routine observations of the Legacy Unit. A visual observation is conducted to determine if dust control measures are adequate. If excess dust is visible, the inspector will take action to minimize dust (e.g., implementing operating changes, or potentially ceasing operations if deemed necessary).

ANNUAL ASSESSMENTS

This CCR Fugitive Dust Control Plan will be reviewed annually by the Jefferies' Group Supervisor to assess the effectiveness of these procedures. This evaluation will consist of the following:

- Review of the Fugitive Dust Control Plan to ensure an accurate and up-to-date inventory of fugitive dust sources and control measures,
- Review of any citizen complaints to confirm that response actions were completed in a timely and effective manner,
- Document the findings of the evaluation and make the necessary revisions to amend the plan, and
- Obtain a Professional Engineer certification as required.

SECTION 5: RECORDKEEPING

Records of citizen complaints are logged through Santee Cooper's Anonymous Hotline Program as well as the Corporate Environmental Incident Policy.

The periodic effectiveness assessment discussed in Section 4 and the Annual CCR Fugitive Dust Control Report are prepared by the Jefferies' Group Supervisor. These reports are maintained in the Environmental Management Information System (EMIS). The Annual CCR Fugitive Dust Report is also made available via the facility operating record and the publicly available internet site. See Table 2 for a recordkeeping summary.

TABLE 2: RECORDKEEPING SUMMARY TABLE

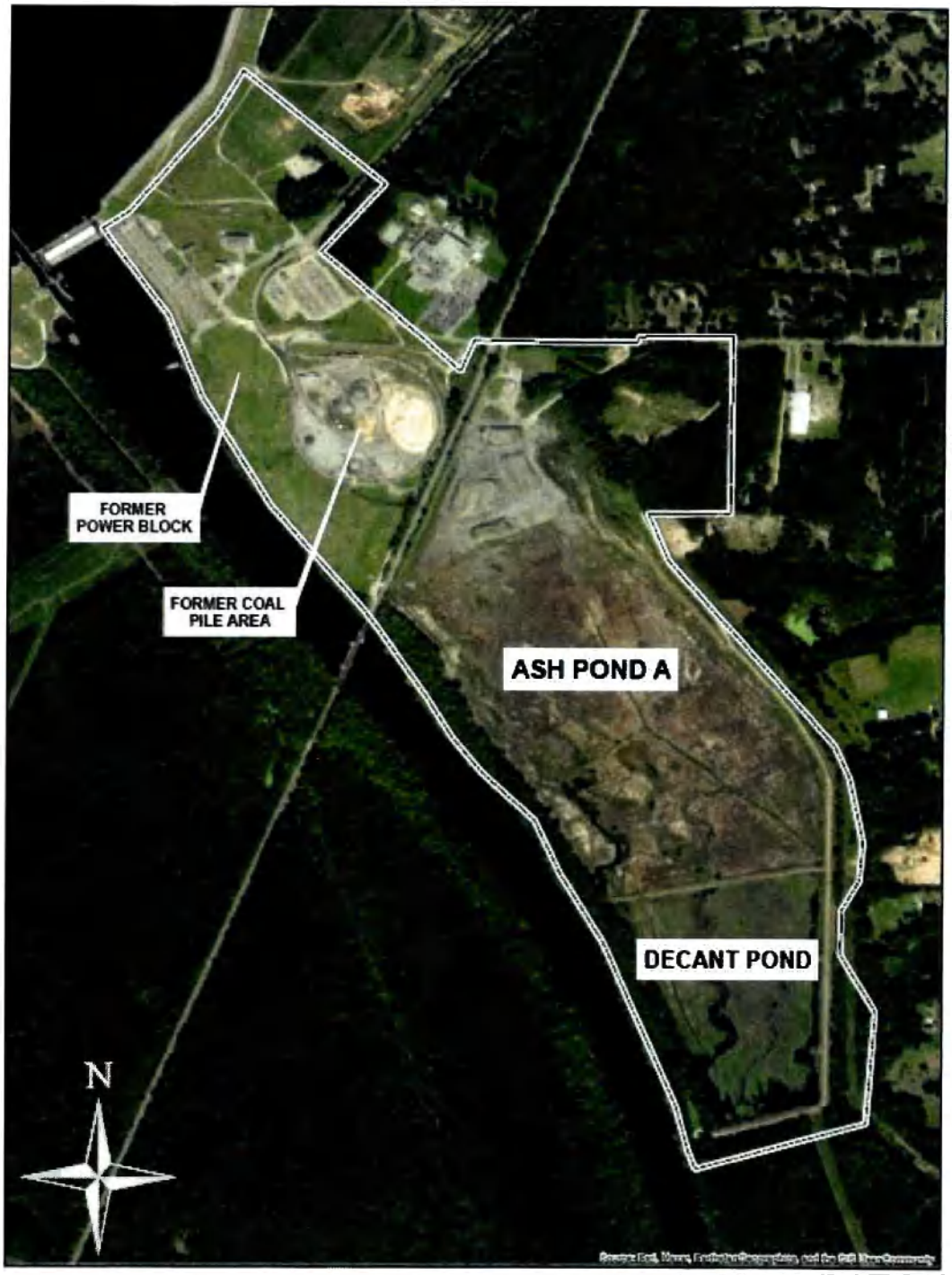
Record	Location	Regulatory Reference
Citizen Complaints	Anonymous Hotline Records; Environmental Incident Records	Not Applicable
CCR Fugitive Dust Control Plan	Operating Record and Public Website	40 CFR 257.105 & 257.107
Annual CCR Fugitive Dust Control Report	Operating Record and Public Website	40 CFR 257.105 & 257.107

SECTION 6: CCR RULE REPORTING

In accordance with 40 CFR 257.80(b)(7)(c), "The owner or operator of a CCR Unit must prepare an Annual CCR Fugitive Dust Control Report that includes a description of the actions 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. The initial annual report must be completed no later than 14 months after placing the initial CCR Fugitive Dust Control Plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the Annual CCR Fugitive Dust Control Report when the plan has been placed in the facility's operating record as required by § 257.105(g)(2)."

The Jefferies' Group Supervisor is responsible for preparing the Annual CCR Fugitive Dust Control Report. This task will be administered through Santee Cooper's Environmental Management Information System (EMIS).

APPENDIX 1: FACILITY MAP IDENTIFYING THE CCR UNIT



0 0.125 0.25 0.5 Miles

Legend

Property Boundary

Santee Cooper
Jefferies Generating Station
Moncks Corner, SC

SITE MAP

Figure 1 July 2024