santee cooper

# Fugitive Dust Control Plan

*for compliance with*

## 40CFR257: Disposal of Coal Combustion Residuals from Electric Utilities

## CCR UNITS:

*(located at Cross Station)*

## Class 3 Landfill

## Bottom Ash Pond

| Fugitive Dust Control Plan<br>REVISION COPY AND CONTROL | |
|---|---|
| **Revision Date** | **Description** |
| 9/2015 | Original to meet the requirements of 40CFR257 Coal Combustion Residuals (CCR) Rulemaking |
| 12/2016 | Removal of Class 2 Landfill from the Plan due to closure of the Class 2 landfill. Removal of the Gypsum Pond from the Plan due to removal of all CCR from the Gypsum Pond. |
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| Distribution List | | |
|---|---|---|
| Air and Water Quality | Electronic Copy | |
| Cross Generating Station Tech Services Superintendent | Electronic Copy | |
| Santee Cooper ECM | Electronic Copy | |
| Santee Cooper External Website: *CCR Rules Compliance Data and Information* | Electronic Copy | |
| Santee Cooper Intranet | Generation Tech Services iPort Page | |

## TABLE OF CONTENTS


| Section Title | | Page |
|---|---|---|
| I. | INTRODUCTION | 3 |
| II. | FUGITIVE DUST SOURCES | 4 |
| III. | CITIZEN COMPLAINT PROCEDURES | 5 |
| IV. | PERIODIC EFFECTIVENESS ASSESSMENT | 5 |
| V. | RECORDKEEPING | 6 |
| VI. | CCR RULE REPORTING | 6 |
| VII. | PROFESSIONAL ENGINEER CERTIFICATION | 7 |

APPENDICES

Reserved

# I. INTRODUCTION

Coal Combustion Residual (CCR) Units located at Cross Station are subject to 40 CFR 257 Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) for Electric Utilities. Section 257.80 of this regulation requires the owner or operator of the CCR Unit 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 October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. 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) *Amendment of the plan.* 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.

## II. FUGITIVE DUST SOURCES

**Table 1: List of CCR Units**

| CCR Unit | Description | Control Measures | Explanation of applicable and appropriate |
|---|---|---|---|
| Bottom Ash Pond | Excavating, Screening, Wind Erosion, Haul Roads | Water Truck. | Ash is reclaimed from Bottom Ash Pond, screened, piled and hauled. Plant staff make daily determinations to dispatch water trucks to minimize fugitive dust. |
| Class 3 Landfill | Haul Roads, Placement, Compaction | Ash Conditioning, Interim Cover, Water Truck, Water Tank, Vegetative Cover | Dust is controlled in landfilling areas by establishing vegetative cover on final cover slopes, and placing interim cover or managing moisture levels on areas which will not be active for extended periods of time. Plant staff make daily determinations to dispatch water trucks as necessary to minimize fugitive dust. |

## III. CITIZEN COMPLAINT PROCEDURES

In accordance with 40CFR257.80(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 the Director of the Environmental Management System to be handled in accordance with the Corporate Environmental Incident Policy (2-46). 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. The Santee Cooper Anonymous Hotline is available to employees and the general public by calling 855-478-0852. Reporting is available seven days a week, 24 hours a day. The Anonymous Hotline Review Committee will communicate all complaints associated with fugitive dust emissions to the

appropriate Santee Cooper personnel. All complaints and corrective actions will be summarized in the annual CCR Fugitive Dust Report.

## IV. PERIODIC EFFECTIVENESS ASSESSMENT

This fugitive dust control plan will be reviewed annually by the Technical Services Superintendent to assess the effectiveness of the procedures. This evaluation will consist of the following:

1. Review of Fugitive Dust Control Plan to ensure accurate and up-to-date inventory of fugitive dust sources and control measures.
2. Review of Citizen Complaint Log

The Technical Services Superintendent is responsible for documenting the findings of the assessment and making the necessary arrangements to amend the plan and obtain a professional engineer certification as required.

## V. RECORDKEEPING

**Table 3: Recordkeeping Summary Table**

| Record | Location | Regulatory Reference | Retention Period |
|---|---|---|---|
| Citizen Complaints | Anonymous Hotline Records<br>Environmental Incident Records | 40 CFR 257 | 5 years |
| Periodic Effectiveness Assessments | Santee Cooper EMIS | 40 CFR 257 | 5 years |
| Annual CCR Fugitive Dust Control Report | Santee Cooper EMIS | 40 CFR 257 | 5 years |

Cross Station personnel perform routine observations of the CCR Units. 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. No records are necessary for these routine observations.

Records of citizen complaints are logged through Santee Cooper's Anonymous Hotline Program as well as the Corporate Environmental Incident Policy (2-46).

Finally, the periodic effectiveness assessment and Annual CCR Fugitive Dust Control Report is prepared by the Superintendent of Technical Services. These reports are maintained in the Environmental Management Information System (EMIS). The Annual Report is also made available via the facility operating record and publically available internet site.

## VI. CCR RULE REPORTING

In accordance with 40CFR257.80(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 Superintendent of Technical Services is responsible preparing the annual CCR fugitive dust control report. This task will be administered through Santee Cooper's Environmental Management Information System (EMIS).

## VII. PROFESSIONAL ENGINEER CERTIFICATION

In accordance with 40CFR257.80(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.

Printed Name of Registered Engineer: KEVIN J. CLARK

Signature of Registered Engineer: Kevin J. Clark

Registration Number: 17299 State of South Carolina

Date: 12/12/2016

SEAL

SOUTH CAROLINA REGISTERED PROFESSIONAL ENGINEER No. 17299 12/12/2016 KEVIN J. CLARK