santee cooper

Fugitive Dust Control Plan

for compliance with

40CFR257: Disposal of Coal Combustion Residuals from Electric Utilities

CCR UNITS:

(located at Winyah Station)

A Ash Pond

B Ash Pond

South Ash Pond

Unit 2 Slurry Pond

Unit 3 & 4 Slurry Pond

Fugitive Dust Control Plan REVISION COPY AND CONTROL	
Revision Date	**Description**
9/2015	Original to meet the requirements of 40CFR257 Coal Combustion Residuals (CCR) Rulemaking
10/2016	Minor Update to 3&4 Slurry Pond Source Description
12/2016	Minor Update to 3&4 Slurry Pond – temporary gypsum stockpiles

Distribution List	
Air and Water Quality	1 Copy
Winyah Generating Station Tech Services Superintendent	1 Copy
Santee Cooper ECM	Electronic Copy
Santee Cooper External Website: *CCR Rules Compliance Data and Information*	Electronic Copy
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Reserved

I. INTRODUCTION

Coal Combustion Residual (CCR) Units located at Winyah 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
A Ash Pond (Unit 1&2)	Excavating, Screening, Wind Erosion, Haul Roads	Plant irrigation system, stockpile tarps and water truck.	Ash is reclaimed from Ash Pond A, screened, piled and hauled. Plant staff make daily determinations to operate plant irrigation and dispatch water trucks to minimize fugitive dust. In addition stockpiles are covered with tarps as necessary.
B Ash Pond (Unit 1&2)	Excavating, Wind Erosion, Haul Roads	Water Truck – vegetative cover over large area	Ash Pond B is heavily covered with vegetative cover and only requires dust mitigation during dry conditions when disturbed by vehicle traffic. Plant staff make daily determinations to dispatch water trucks as necessary to minimize fugitive dust.
Slurry Pond (Unit 3&4)	Excavating, Wind Erosion, Haul Roads, Temporary Stockpiles	Water Truck, stockpile tarps	Slurry Pond receives scrubber slurry and storm water. Slurry is currently being excavated for beneficial reuse. There is little potential for fugitives due to moisture content of pond. Gypsum is temporarily being stockpiled and can be tarped, if necessary. Truck traffic fugitive dust is controlled as necessary by water trucks.

CCR Unit	Description	Control Measures	Explanation of applicable and appropriate
South Ash Pond (Unit 3&4)	Haul Roads	Vegetative cover and water truck as needed	Large portion of South Ash Pond covered by vegetation. Plant staff make daily determinations to dispatch water trucks as necessary to minimize fugitive dust.
Slurry Pond (Unit 2)	Excavating, Wind Erosion, Haul Roads	Water Truck	Slurry Pond is currently being emptied and material contains significant moisture which does not readily produce fugitive dust. Truck traffic fugitive dust is controlled as necessary by water trucks.

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 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

Winyah 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: Domenic J. Ciccolella

Signature of Registered Engineer: [signature]

Registration Number: 29982 State of South Carolina

Date: 12/13/16

SEAL

SOUTH CAROLINA REGISTERED PROFESSIONAL ENGINEER No. 29982 DOMENIC J. CICCOLELLA