

CCR Fugitive Dust Control Plan

A.B. Brown Ash Pond, Landfill, and Landfill Settling Basin

40 CFR 257.80 (b)

Version: 1.0

October 16, 2015

Review / Revision Log

DATE	REVISION LEVEL	REVIEW / REVISION NOTES	REVIEWER'S INITIALS
10/16/2015	1.0	Initial Plan	LCM

Background

The A.B. Brown station utilizes a dry ash handling system for fly ash. When the system is unavailable due to equipment maintenance, kiln outage, or river levels, fly ash is wet sluiced to the ash pond. Bottom ash is currently sluiced to the on-site ash pond.

The waste that is currently placed in the A.B. Brown Type III RWS Landfill consists solely of flue gas desulfurization sludge. The material is conditioned with water prior to transport to the landfill. The material is then placed in trenches located within the limits of the landfill. Water from the trenches is piped to the Landfill Settling Basin. Any solids carried by the water settle out in the basin prior to the water eventually receiving further treatment. The waste in the landfill trenches is removed and placed in the landfill using a dragline excavator. The stockpiled material is then either loaded into trucks for transport to other portions of the landfill, or spread and compacted for final disposal at that location. In addition, water from the floor drains in the scrubber belt filter and truck loading area are also pumped to the ash pond for settling.

§257.80(b) The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

This document outlines the plan that is utilized to control dust at the Coal Combustion Residuals Units (Ash Pond, Landfill, and Landfill Settling Basin) at the A.B. Brown Generating Station, which is located near West Franklin, Indiana. This plan identifies the procedures that will be utilized at the units to ensure compliance with Section 257.80(b) of the CCR Rule, which requires the implementation of a dust control plan to minimize the potential for CCR to become airborne.

§257.80(b)(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 elected are applicable and appropriate for site conditions.

Fly ash is pneumatically transported from the station to the barge loading facility. The fly ash is contained within a piping system from the station to the loading facility to control dusting. When fly ash is sluiced to the pond, it is placed in a wetted condition and generally submerged in the pond.

Bottom ash is sluiced to the on-site ash pond. The majority of the discharged ash is submerged in the pond.

In areas where the ash is exposed, dusting may be controlled by operating a water spray or fogging system; using wind barriers, compaction, or vegetative covers; or through the use of a commercial dust control product (e.g., lignin based materials, Soil-Sement, Eco-Flex, Eco Green Barrier, EcoBlend, Gorilla-Snot, TackDown, Mincryl X50, Steadfast, Pennz Suppress, Coconut Mats, etc.).

As required in the A.B. Brown Landfill Permit, the waste is placed in compacted lifts in the landfill and covered annually with either a 6 inch layer of intermediate soil cover or the final cover soils. The A.B. Brown Landfill has successfully controlled fugitive dust from the landfill in the past using the operational procedures outlined below. Since these procedures have been successful in minimizing fugitive dust, the facility has incorporated them into this Dust Control Plan.

- The water content of waste will be adjusted, to the extent possible, to condition the material prior to placement in the landfill.
- As needed, a water truck will be utilized to spray water on the exposed surface of the waste.
- The traffic of support equipment will be directed to use specific areas, as needed, to minimize the disturbance of the waste in any non-active areas.
- In some areas, berms may be constructed to serve as wind breaks.
- In extreme high wind conditions, the placement of waste in the landfills with the dragline excavator may be delayed to the extent possible by leaving the waste in the trenches.

In addition to utilizing the procedures outlined above, Vectren will use the following cover materials on an as-needed basis prior to covering the waste with intermediate cover or final cover:

- Commercial dust control products (e.g., lignin based materials, Soil-Sement, Eco-Flex, Eco Green Barrier, EcoBlend, Gorilla-Snot, TackDown, Mincryl X50, Steadfast, Pennz Suppress, Coconut Mats, etc.)

In the event that other products are found to be effective, Vectren will modify the dust control plan to identify the new material.

In the event that the use of a combination of the operational procedures and alternative cover materials outlined above do not provide the required dust control, Vectren will add soil materials as needed. Vectren will either maintain a stockpile of cover soils near the landfill or provide all weather access to a near-by soil borrow area for this purpose.

Additionally, in the event that fugitive dust is observed, and/or when predicted weather conditions indicate that fugitive dust is likely, Vectren will take special precautions to modify operations at the CCR units to the extent practicable.

On days when alternative cover materials or soil cover materials are applied, the supervisor of the landfill operations, someone designated by the supervisor, or an Environmental Affairs representative will record the following information:

- Date
- Name of Observer
- General weather conditions
- General location where fugitive dust was observed.
- Identification of approximate location of daily and intermediate cover soils and/or alternative cover materials placed that day.

257.80(b)(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.

The waste that is currently placed in the AB Brown Landfill consists solely of flue gas desulfurization sludge. The material is conditioned with water prior to transport to the landfill. The material is then placed in trenches located within the limits of the landfill. The waste is removed from the trenches and placed in the landfill using a dragline excavator. The stockpiled material is then either loaded into trucks for transport to other portions of the landfill, or spread and compacted for final disposal at that location. Once the waste has been placed and compacted, it is either covered with an intermediate soil cover, an alternative cover, or with final cover soils.

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.

In the event citizen complaints regarding fugitive dust are received, those complaints will be logged, investigated, and responded to as appropriate. Complaints can be submitted via telephone or by sending an email to CCR_Inquiries@vectren.com.

257.80(b)(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.

This fugitive dust control plan will be reviewed on at least an annual basis by Vectren's Environmental Affairs department. In addition to utilizing the operational procedures outlined in 257.80(b)(2), observations regarding fugitive dust are made by trained employees as required by the current Title V Air Permit.

257.80(b)(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).

This initial plan has been prepared and placed into the operating record no later than October 19, 2015.

257.80(b)(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.

This plan will be updated as needed based on the results of reviews of the plan's effectiveness, when operational procedures warrant an update, or when another change in conditions warrant an update.

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 certify that this CCR Fugitive Dust Control Plan meets the requirements of 40 CFR §257.80(b).

Signature: Donald L. Bryenton

Name: Donald L. Bryenton

Title: Principal Engineer

Certification Date: 10/16/15

