

CCR Fugitive Dust Control Plan

F.B. Culley East Ash Pond

40 CFR 257.80 (b)

Version: 2.0

October 16, 2015
Revised November 21, 2018

Review / Revision Log

DATE	REVISION LEVEL	REVIEW / REVISION NOTES	REVIEWER'S INITIALS
10/16/2015	1.0	Initial Plan	LCM
12/12/2016	1.0	Reviewed Plan	ACS
12/12/2017	1.0	Reviewed Plan	ACS
11/21/2018	2.0	Removed references to wet sluicing of dry fly ash.	ACS

Background

The F.B. Culley station utilizes a dry ash handling system for fly ash. When the system is unavailable due to equipment maintenance, fly ash is processed in the pug mill for preparation for transportation to designated disposal facility or beneficial use location. Bottom ash is currently sluiced to the on-site ash pond. Gypsum is conveyed to a gypsum silo and loaded onto a barge via a covered conveyor system or loaded into trucks and shipped offsite for beneficial use.

§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 Unit (East Ash Pond) at the F.B. Culley Generating Station, which is located near Yankeetown, Indiana. This plan identifies the procedures that will be utilized at the unit 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 selected are applicable and appropriate for site conditions.

Fly ash is pneumatically transported within an enclosed system from the station to the dry fly ash silo onsite. From there the fly ash is loaded into trucks for transport to either the Dry Fly Ash Silo located near the A.B. Brown Station near West Franklin, Indiana for loading onto a barge, or for transport to a disposal facility or beneficial use location.

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.).

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

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 unit to the extent practicable.

On days when cover materials are applied, a manager, someone designated by the manager, 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 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 F.B. Culley facility does not have a CCR landfill.

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: 11/21/18

