

Annual Assessment of the Effectiveness of the Site Fugitive Dust Control Plan – 40 CFR §257.80(4)  
October 16, 2017

This serves to address the annual requirement to assess the effectiveness of the site's Fugitive Dust Control Plan.

Fugitive emissions are possible in equipment flanges/piping leading to the storage silos. Off-spec fly ash, that is not shipped off-site for beneficial use and requires on-site disposal, is conveyed in slurry form to the surface impoundment. The surface impoundment is surrounded on three sides by dense tree cover that serves as a windbreak. Dry areas of the impoundment are generally either crusted over or covered with vegetation. CCR is not typically landfilled on site in piles. New smaller piles (generally less than 10 feet in height) are created within the surface impoundment boundary when the material is being recovered as a plant product for off-site beneficial re-use (and thus, because they are part of beneficial re-use operations are not considered CCR piles per §257.73). Ingress and egress from the surface impoundment is via a paved road. The road surrounding the surface impoundment is a dirt road that is primarily vegetated with the exception of the tire paths.

The plan has been effective in controlling fugitive dust from the CCR impoundment areas. This has been accomplished by the following actions:

- 1) Maintaining the existing tree line and other vegetative cover, which serve as wind barriers.
- 2) Minimizing material fall distances to the lowest level reasonably practicable.
- 3) Using water spray, as needed, during earth moving activities.
- 4) Ceasing earth moving activities during high wind days.
- 5) Limiting vehicular traffic, as much as possible.
- 6) Reminding drivers to adhere to the posted signage to drive slowly.
- 7) Ensuring that all bottom ash trucks are covered before leaving the area.
- 8) Maintaining all fly ash silo equipment.

There were no citizen complaints since the initial Plan was entered into the operating record.

Rick Coleman  
EHS Manager

Handwritten signature of Rick Coleman in blue ink, dated 10/16/17.