

Annual Assessment of the Effectiveness of the Site Fugitive Dust Control Plan – 40 CFR §257.80(4)
October 15, 2019

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 fly ash storage silos, defective silo bin vent filters and especially from loss of negative pressure in the annulus surrounding the fly ash telescoping delivery shoot. Pressurized segments of fly ash piping and equipment flanges are periodically inspected for leaks. If leaks are found, a work order is entered into the Maximo tracking system and repaired on a priority basis. Most sections of fly ash piping are under negative pressure, so fugitive emission, from these areas are unlikely.

Maximo-generated PMs are issued quarterly to check the bin vent filters for buildup on the bags and cartridges, and to check for pinhole leaks.

Monthly, Boral Resources personnel check the negative pressure fans and lubricate the fan and belt motor grease fittings. The system is configured so that if the annulus fan is not running, neither of the two ash silo can be operated.

Off-spec fly ash that is not shipped off-site for beneficial use requires on-site disposal. To minimize dust, the off-spec. ash 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 temporarily created, within the surface impoundment boundary, when the material is being recovered as a 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.

In 2019, the plan has been effective in controlling fugitive dust from the CCR impoundment areas. This has been accomplished by implementation of 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) Ensuring signage, "Dust Control Area - Drive Slowly", is maintained and clearly visible.
- 7) Reminding drivers to adhere to the posted signage to drive slowly.
- 8) Ensuring that all bottom ash trucks are covered before leaving the area.
- 9) Maintaining all fly ash silo bin vent filters and other equipment.
- 10) Ensuring all fly ash trucks are washed down before leaving the scales.
- 11) Washing down the scales after each fly ash load-out.

There were no citizen complaints since the initial Site Fugitive Dust Control Plan was entered into the operating record.

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LUMINANT