Prepared for

Dynegy Midwest Generation, LLC
1500 Eastport Plaza Drive
Collinsville, Illinois 62234

CCR FUGITIVE DUST CONTROL PLAN

VERMILION POWER PLANT
NEW EAST ASH POND
OAKWOOD, ILLINOIS

Prepared by

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1. INTRODUCTION

Dynegy Midwest Generation, LLC (Dynegy) is the owner of the inactive coal-fired Vermilion Power Plant (VPP), also referred to as Vermilion Power Station, located approximately 13 miles Northwest of Danville, Illinois. The New East Ash Pond (NEAP) is an inactive surface impoundment storing coal combustion residuals (CCR).

The requirements for the NEAP are found in two regulatory documents[1]:

- 35 Ill. Admin. Code 845, Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments (Part 845).

- Federal Register Volume 80, No. 74, air operating criteria of the United States Environmental Protection Agency's Hazardous and Solid Waste Management System; Disposal of CCR From Electric Utilities; Final Rule 40 CFR Part 257 (Part 257).

Part 845.500(a) and 40 CFR 257.80(a) mandates the *owner or operator of a CCR unit to adopt measures that will effectively minimize CCR from becoming airborne at the facility*. Further, to satisfy this regulation, Part 845.500(b) and 40 CFR 257.80(b) requires CCR units to *prepare and operate in accordance with a CCR fugitive dust control plan*.

This Fugitive Dust Control (FDC) Plan for the NEAP addresses the requirements of Part 845.500 and 40 CFR 257.80 to control fugitive dust that may originate from CCR impoundments, roads, CCR management, handling, and transportation activities.

1.1. Facility Information

Facility:	Vermilion Power Plant 10188 East 2150 North Rd Oakwood, IL 61858
Owner/Operator:	Dynegy Midwest Generation, LLC 1500 Eastport Plaza Drive Collinsville, IL 62234

[1] Italicized font is language quoted from the cited rule.

2. CCR FUGITIVE DUST CONTROL MEASURES AND APPROPRIATENESS

Section 845.500(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. Examples of control measures that may be appropriate include: locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

40 CFR 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. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

CCR fugitive dust has the potential to become airborne at the facility during periods of CCR management, handling, and/or transportation. Because the facility is inactive/retired, handling and transportation of CCR is no longer taking place. As a result, the potential for airborne CCR fugitive dust are limited to the surface impoundment and therefore this FDC Plan only covers the surface impoundment.

This Section identifies and describes the control measures selected and adopted by the facility to minimize CCR from becoming airborne at the facility and explains how the selected measures are applicable and appropriate for site conditions. The control measures may be adjusted or modified based on observed effectiveness of minimizing CCR from becoming airborne and weather conditions.

2.1. Management of CCR in the CCR Surface Impoundments

The facility manages CCR in a surface impoundment located at the facility. **Table 2-1** identifies CCR fugitive dust control measures that have been selected for use by the facility during CCR management in the CCR surface impoundments and explains how the selected measures are applicable and appropriate for site conditions. The facility will use the identified measures during CCR management in the CCR surface impoundments to minimize CCR from becoming airborne at the facility. CCR management within the surface impoundments is minimal and only occurs during required maintenance.

Table 2-1. Control Measures for CCR Management in CCR Surface Impoundments

CCR Activity	CCR Fugitive Dust Control Measures	Applicability and Appropriateness of Control Measures
Management of CCR in the facility's CCR unit	Water dry CCR material disturbed during routine maintenance, as necessary.	Wetting CCR reduces the potential for CCR fugitive dust generation during handling of CCR during routine maintenance if handling is required.
	Water areas of exposed CCR in CCR surface impoundments, as necessary.	Water will be applied to areas of exposed CCR to maintain moisture content to minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions.
	Allow naturally occurring grass vegetation to develop in areas of exposed CCR in CCR surface impoundments, as necessary.	Vegetation provides a wind screen and/or cover to reduce wind entrainment of CCR.
	Apply chemical dust suppressant on areas of exposed CCR in CCR surface impoundments, as necessary.	Mixing an appropriate chemical dust suppressant with water and applying to areas of exposed CCR will minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions.

3. PROCEDURES TO LOG CITIZEN COMPLAINTS

Section 845.500(b)(2): The CCR fugitive dust control plan must include procedures to log every complaint from members of the public received by the owner or operator involving CCR fugitive dust events at the facility. The owner or operator must:

A) Include for each logged complaint the date of the complaint, the date of the incident, the name and contact information of the complainant, if given, and all actions taken to assess and resolve the complaint; and

B) Submit quarterly reports to the Agency no later than 14 days from the end of the quarter of all complaints received in that quarter, including the information required by subsection (b)(2)(A).

40 CFR 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 the owner or operator of the facility receives a citizen complaint involving a CCR fugitive dust event at the facility, relevant information about the compliant will be logged. Information that will be recorded includes, as applicable:

- Date/Time the complaint is received.
- Date/Time and duration of the CCR fugitive dust event.
- Description of the nature of the CCR fugitive dust event.
- Name of the citizen entering the complaint (if provided).
- Address & phone number of citizen entering the complaint (if provided).
- Name of the personnel who took the complaint.
- All actions taken to assess and resolve the complaint.

All citizen complaints involving CCR fugitive dust events at the facility will be investigated promptly. As deemed appropriate or necessary, corrective measures will be taken and a follow-up response will be provided to the complainant. Quarterly reports will be submitted to IEPA in accordance with Section 845.500(b)(2)(B). The annual report will include all records of citizen complaints and a summary of any corrective measures taken in accordance with Section 845.500(c) and 40 CFR 257.80 (c).

4. PROCEDURES FOR PERIODIC ASSESSMENT OF THE PLAN

Section 845.500(b)(3): 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.

40 CFR 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.

The facility conducts inspections associated with CCR fugitive dust control. The facility also uses the procedures identified in Section 3 of this plan to log citizen complaints involving CCR fugitive dust events at the facility. These inspections and the investigations of citizen complaints will be used to periodically assess the effectiveness of the CCR fugitive dust control plan.

When a CCR fugitive dust event is observed or a citizen complaint involving a CCR fugitive dust event at the facility is received, current CCR management practices will be reviewed to see that the selected control measures are being properly implemented. If the control measures are not being properly implemented, relevant operating personnel will be notified and, as warranted, re-trained in the proper implementation of CCR fugitive dust control measures. If appropriate, use of revised and/or additional control measures will be evaluated. As warranted, revised and/or additional control measures found to be applicable and appropriate to control CCR fugitive dust emissions will be incorporated into an amended CCR FDC Plan.

The plan also will be reassessed in the event of material changes in site conditions potentially resulting in CCR fugitive dust becoming airborne at the facility.

5. INITIAL PLAN & AMENDMENTS

Section 845.500(b)(4): The owner or operator of a CCR surface impoundment must prepare an initial CCR fugitive dust control plan for the facility by October 31, 2021, or by initial receipt of CCR in any CCR surface impoundment at the facility if the owner or operator becomes subject to this Part after October 31, 2021.

40 CFR 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).

The initial CCR fugitive dust control plan was submitted to the state of Illinois before October 31, 2021. Consistent with the CCR Rule that requires submittal of the FDC Plan by the effective date of the CCR Rule, the FDC Plan will be submitted on or before November 8, 2024, the effective date of the Legacy Rule.

Section 845.500(b)(5): Amendment of the Plan. The owner or operator of a CCR surface impoundment subject to the requirements may amend the written CCR fugitive dust control plan at any time provided the revised plan is submitted to the Agency. 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 surface impoundment.

40 CFR 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, such as the construction and operation of a new CCR unit.

The written CCR FDC Plan may be amended at any time provided the revised plan is placed in the facility's operating record as required by Section 845.800(d)(7) and 40 CFR 257.105(g)(1). The written CCR fugitive dust control plan must be amended whenever there is a change in conditions that would substantially affect the written plan in effect as required by Section 845.500(b)(5) and 40 CFR 257.80(b)(6).

Table 5-1. CCR Fugitive Dust Control Plan Amendments

Amendment Number and Date	Pages or Section	Description of Amendment	Professional Engineer Certifying Plan
Version 0 October 2021	NA	Initial Plan	John Seymour, PE
Amendment 1	Multiple	Incorporate 40 CFR 257 CCR Legacy Rule	Thomas Ward, PE

6. RECORDKEEPING

Section 845.500(b)(6): *The owner or operator must place the initial and any amendments to the fugitive dust control plan in the facility's operating record as required by Section 845.800(d)(7). The most recent fugitive dust control plan must be placed in the facility's operating record and available on the owner's or operator's CCR website before submitting a permit application under this Part.*

40 CFR 257.105(g): *Operating criteria. The owner or operator of a CCR unit subject to this subpart must place the following information, as it becomes available, in the facility's operating record:*

(1) The CCR fugitive dust control plan, and any subsequent amendment of the plan, specified under § 257.80 (b), except that only the most recent control plan must be maintained in the facility's operating record irrespective of the time requirement specified in paragraph (b) of this section.

(2) The annual CCR fugitive dust control report required by § 257.80(c).

The written CCR FDC Plan, any amendment of the written plan, and the annual CCR fugitive dust control report required by Section 845.500(c) and 40 CFR 257.80(c), will be placed in the facility's written operating record as required by Section 845.800(d)(7) and 40 CFR 257.105(g). The most recent CCR FDC Plan will be placed on the website as required by Section 40 CFR 257.107(g). Notification of the availability of the CCR fugitive dust control plan, any amendment of the plan, and the annual CCR fugitive dust control report will be provided to the IEPA State Director in accordance with 40 CFR 257.106(g).

7. CERTIFICATION

40 CFR 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.

CCR Unit: Dynegy Midwest Generation, LLC; Vermilion Power Plant, New East Ash Pond

I, Thomas Ward, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify in accordance with Section 845.500(b)(7), to the best of my knowledge, information, and belief, that the information contained in this plan has been prepared in accordance with the accepted practice of engineering and meets the requirements of Section 845.500(b).

Additionally, I, Thomas Ward, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify in accordance with 40 CFR 257.80(b)(7), to the best of my knowledge, information, and belief, that the information contained in this plan has been prepared in accordance with the accepted practice of engineering and meets the requirements of 40 CFR 257.80(b).

Thomas Ward
Printed Name

TWW 11/7/24
Signature Date

062.069043 Illinois 30 November 2025
Registration Number State Expiration Date

Affix Seal