

**CCR FUGITIVE DUST CONTROL PLAN
SANDOW 5 GENERATING PLANT
OCTOBER 2015**

As required by 40 Code of Federal Regulations (CFR) §257.80, this plan identifies and describes the control measures that Sandow Steam Electric Station (Sandow 5) will use to minimize fugitive dust emissions from the following Coal Combustion Residual (CCR) units:

Description	CCR Type
AX Landfill	Landfill

Sandow will use combinations of the following dust control measure(s):

- Source located inside an enclosure or partial enclosure
- Water spray or fogging system
- Reduction in fall distance
- Wind barrier
- Compaction
- Vegetative cover
- Reduced vehicle speed limits
- Paving and sweeping roads
- Covering transport trucks
- High wind event operating limitations
- Application of daily cover
- Other

Discussion of Dust Control Measure(s) – 40 CFR §63.257.80(b)(1)

Sandow has only one landfill that falls under the requirements of an onsite CCR unit. The AX Landfill has the potential for fugitive dust. The AX Landfill is registered to receive fly ash and bed ash. To minimize dusting the fly ash and bed ash is conditioned with water as the material is loaded into trucks from the storage silo. This provides the material with enough moisture to prevent wind dispersal during transport and unloading into the landfill.

A vacuum truck is used on paved roads to remove excess dust throughout the plant. All plant roads are watered as necessary to prevent dusting. Additionally, vehicle speeds are limited to reduced speeds throughout the plant. These practices sufficiently minimize fugitive dust. Any additional watering for the landfill and all other areas will be performed as necessary.

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Procedures to Emplace CCR as conditioned CCR – 40 CFR §63.257.80(b)(2)

As discussed above, all fly ash and bed ash is conditioned as the material is being loaded into the transport vehicles. This is required to minimize fugitive dust.

Procedures to Log Citizen Complaints – 40 CFR §63.257.80(b)(3)

See Attachment 1 for procedures.

Procedures to Assess Effectiveness of the Control Plan – 40 CFR §63.257(b)(4)

See Attachment 2 for procedures.

Completion of Initial CCR Fugitive Dust Control Plan – 40 CFR §63.257(b)(5)

The initial CCR fugitive dust control plan was completed on 10/16/2015 and was placed in the operating record on 10/16/2015. The plan was posted on the Luminant CCR website on 11/19/2015.

Amendment of the Plan – 40 CFR §63.257.80(b)(6)

The plan will be amended as necessary to account for conditions that would substantially affect the plan currently in effect. The revised plan will be placed in the facility's operating record.

Professional Engineer Certification – 40 CFR §63.257.80(b)(7)

This initial fugitive dust control plan has been certified by a registered Professional Engineer to meet the requirements of this section. See Attachment 3. Any subsequent amendments of this plan must also be certified by a registered Professional Engineer.

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ATTACHMENT 1

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**CCR FUGITIVE DUST CONTROL PLAN
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Procedure to Log Citizen Complaints

Citizen complaints may be received through a variety of ways. Common methods would be through (1) a complaint submitted to the Texas Commission on Environmental Quality, (2) a call to the main operating phone line, likely received by the operator or front guards, or (3) an in-person complaint, likely received by the guards at the front gate or 4) call to the Community Relations office.

For complaints submitted to the TCEQ, all available information will be entered into the following form.

If a phone call or in-person complaint is made, the complainant should be directed to the onsite environmental supervisor and Dallas ES should be contacted. The following form should be completed for each complaint received.

For each complaint, operational data and other pertinent information should be collected and evaluated. If necessary, corrective actions should be determined and a dust mitigation plan should be developed. All corrective actions, if necessary, should be documented. All other pertinent information should also be documented.

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**CITIZEN COMPLAINT LOG
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Complainant Name*	
Complainant Address*	
Complainant Phone Number or Email Address*	
How Was Complaint Received?	
Date/Time of Event (Start/End)	
Date/Time of Complaint	
General Description of Complaint (i.e., fugitive dust, odor, smoke, etc.)	
Detailed Description of Complaint	
Impact of Event (i.e., health, property, etc.)	
General Location of Where Alleged Issue was Occurring and What was believed to be the source of the problem	
Was any evidence collected to substantiate complaint (i.e., pictures, videos, physical samples, etc.)?	
Name and Contact of Who Received Complaint	
Name and Date/Time of person contacted in ES-Dallas	

*This information is optional; however, we will not be able to contact them for follow-up information or advise them of any conclusions or follow-up actions.

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ATTACHMENT 2

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**CCR FUGITIVE DUST CONTROL PLAN
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Procedure to Assess Effectiveness of the Control Plan

In association with the preparation of the annual CCR fugitive dust control report required under 40 CFR §63.80(c), review this entire document and determine if the plan is still effective at minimizing fugitive CCR dust. Additionally, this review can be completed and the control plan amended at any time.

The following specific items should be evaluated:

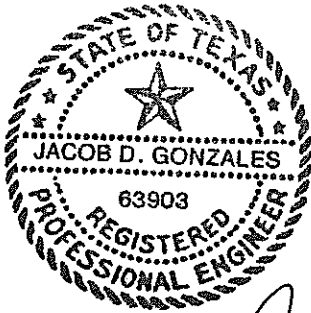
- Any complaints received in the past year,
- Any operational issues raised, and
- Any alternate control strategies suggested by operational personnel.

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ATTACHMENT 3

The preceding Fugitive Dust Control Plan for Sandow Steam Electric Station was prepared under my direction:



10-5-15

Jacob D. Gonzales

Jacob D. Gonzales, P.E.
Luminant Power