

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

This Fugitive Dust Control (FDC) Plan addresses the requirements of Part 845.500(b) for the North Ash Pond (NEAP).

### 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

## 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.*

CCR fugitive dust has the potential to become airborne at the facility during periods of CCR management that can cause CCR to be exposed in the CCR surface impoundment. Areas at the facility that have the potential for airborne CCR fugitive dust are limited to the surface impoundment.

This Section 2 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).*

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 complaint 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).

#### 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.*

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.*

The initial CCR fugitive dust control plan will be submitted by October 31, 2021.

*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.*

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). 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).

**Table 5-1. CCR Fugitive Dust Control Plan Amendments**

<b>Amendment Number and Date</b>	<b>Pages or Section</b>	<b>Description of Amendment</b>	<b>Professional Engineer Certifying Plan</b>
Version 0 October 2021	NA	Initial Plan	John Seymour, 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.*

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) will be placed in the facility's written operating record as required by Section 845.800(d)(7).

