

CCR Fugitive Dust Control Plan

for

Baldwin Power Plant

Prepared for:

Dynegy Midwest Generation, LLC

**Baldwin Power Plant
10901 Baldwin Road
Baldwin, IL 62217**

Prepared by:

**Burns & McDonnell
Kansas City, Missouri**

Amendment 1
October 2021

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1 Introduction

This Coal Combustion Residuals (CCR) fugitive dust control plan has been prepared for the Baldwin Power Plant, located in Randolph County, Illinois. This plan addresses the air criteria in 40 C.F.R. § 257.80 of the United States Environmental Protection Agency's CCR rule, which requires the owner or operator of a CCR unit to "adopt measures that will effectively minimize CCR from becoming airborne at the facility" and to "prepare and operate in accordance with a CCR fugitive dust control plan." The plan also addresses the air criteria in 35 I.A.C. 845.500 of the Illinois Environmental Protection Agency's CCR rule, which contains similar requirements to the federal CCR rule.

1.1 Facility Information

- Facility Name: Baldwin Power Plant
- Facility Address: 10901 Baldwin Road, Baldwin, IL 62217
- Owner/Operator: Dynegy Midwest Generation, LLC (DMG)

1.2 Certification

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 40 C.F.R. § 257.80 and 35 I.A.C. 845.500. See 40 C.F.R. § 257.80(b)(7); 35 I.A.C. 845.500(b)(7).

I certify under penalty of law that, to the best of my knowledge, this plan meets the requirements of 40 C.F.R. § 257.80 and 35 I.A.C. 845.500. This certification is based on my review of the document and conditions at the site and on my inquiry of the person or persons who managed the preparation of this document.

John R. Hesemann

Printed Name of Qualified Professional Engineer

John R. Hesemann 9/02/2021
Signature of Qualified Professional Engineer and Date

062.058523 – Illinois – Expires 11/30/2021

Registration Number and State



2 CCR Fugitive Dust Control Measures and Appropriateness

CCR fugitive dust has the potential to become airborne at the facility during periods of CCR management in the CCR units, CCR handling and CCR transport. Areas at the facility that have the potential for airborne CCR fugitive dust are CCR surface impoundments, CCR handling equipment and CCR transport in trucks and rail cars. 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 Units

The facility manages CCR in surface impoundments located at the facility. Table 2-1 below identifies CCR fugitive dust control measures that have been selected for use by the facility during CCR management in the CCR units, including placement of CCR into the CCR units, 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 units to minimize CCR from becoming airborne at the facility.

| CCR Activity | CCR Fugitive Dust Control Measure | Applicability and Appropriateness of Control Measure |
|---|---|---|
| Management of CCR in the facility's CCR units | Wet management of CCR bottom ash and management of dry-handled CCR fly ash in CCR surface impoundments. | Wet management of bottom ash and moisture conditioning of fly ash as needed minimizes the potential for CCR fugitive dust generation. |
| | Water areas of exposed CCR in CCR units, 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. |
| | Naturally occurring grass vegetation in areas of exposed CCR in CCR surface impoundments. | Vegetation provides a wind screen and/or cover and reduces wind entrainment of CCR. |
| | Reduce or halt operations during high wind events, as necessary. | Reducing or halting operations during high wind events minimizes the potential for CCR fugitive dust generation. |

Table 2-1. Control Measures for CCR Management in CCR Units

2.2 Handling of CCR

CCR is regularly removed from the boiler system and conveyed to the CCR handling system, which includes silos and truck and railcar loading areas. CCR fly ash and CCR flue gas desulfurization (FGD) materials are pneumatically conveyed in an enclosed system from the boiler system to storage silos. When unloading the CCR FGD silos for transport to an offsite third-party landfill, a pug mill is used to condition the CCR FGD as it is loaded into trucks. CCR fly ash is loaded from the silo dry into rail cars with a loading spout. Water is added when loading CCR fly ash from the silo into trucks for on-site transport. CCR bottom ash is wet sluiced into CCR surface impoundments. Table 2-2 below identifies CCR fugitive dust control measures that have been selected for use by the facility during handling of CCR and explains how the selected measures are applicable and appropriate for site conditions. The facility will use the identified measures when handling CCR to minimize CCR from becoming airborne at the facility.

| CCR Activity | CCR Fugitive Dust Control Measure | Applicability and Appropriateness of Control Measure |
|---------------------------------|---|--|
| Handling of CCR at the facility | Wet sluice CCR bottom ash to CCR surface impoundments. | Wet sluicing CCR minimizes the potential for CCR fugitive dust generation. |
| | Pneumatically convey dry CCR fly ash and CCR FGD materials to storage silos in an enclosed system. | Conveying CCR in an enclosed system minimizes the potential for CCR fugitive dust generation. |
| | Condition CCR FGD materials to be emplaced in an offsite third-party owned/operated landfill before it is loaded into trucks for transport to the landfill. | Conditioning allows CCR to bind together and thus minimizes the potential for CCR fugitive dust generation while loading CCR into trucks (and during transport and emplacement in the landfill). |
| | Add water to CCR fly ash at the loadout silo for on-site transport. | Wetting CCR fly ash reduces the potential for CCR fugitive dust generation during loading. Wetting activities will be conducted in a manner that does not generate "free liquids". |
| | Load CCR transport trucks from the CCR fly ash and CCR FGD materials silos in a partially enclosed area. | Partial enclosure of the CCR transport truck loading area reduces the potential for wind to cause CCR fugitive dust to become airborne. |
| | Load CCR transport trucks from the CCR fly ash silos using a telescoping chute, when applicable. | Use of a telescoping chute reduces the drop height from the end of the chute into the truck and minimizes the potential for CCR fugitive dust to become airborne. |
| | Transfer CCR dry fly ash into rail cars using a railcar loading spout and associated dust filter collection system, as necessary. | Use of a loading spout and associated dust filter collection system minimizes the potential for CCR fugitive dust to become airborne. |
| | Perform housekeeping, as necessary, in the CCR ash loading areas. | Good housekeeping measures, such as sweeping or wetting the loading area, minimize the potential for CCR fugitive dust generation during handling activities. |
| | Operate CCR fly ash and CCR FGD materials handling system in accordance with good operating practices. | Operation in accordance with good operating practices minimizes the potential for CCR fugitive dust generation. |
| | Maintain and repair as necessary dust controls on the CCR fly ash handling system and the CCR fly ash rail and truck load-out systems. | Performing maintenance and repairs as needed to maintain dust controls in good operating condition minimizes the potential for CCR fugitive dust generation. |
| | Reduce or halt operations during high wind events, as necessary. | Reducing or halting operations during high wind events minimizes the potential for CCR fugitive dust generation. |

Table 2-2. Control Measures for Handling CCR

2.2.1 Conditioning of CCR Prior to Emplacement in CCR Landfill

Conditioned CCR is CCR that has been wetted with water or an appropriate chemical dust suppressant. Water or a chemical dust suppressant is added to raise the moisture content of the CCR to prevent wind dispersal but will not result in free liquids. Conditioning allows for the CCR to bind together, which minimizes the potential for CCR fugitive dust.

2.3 Transportation of CCR

CCR is transported via truck at the facility using a combination of paved and unpaved facility roads. Table 2-3 below identifies CCR fugitive dust control measures that have been selected for use by the facility during transport of CCR. The facility will use the identified measures when transporting CCR to minimize CCR from becoming airborne at the facility.

| CCR Activity | CCR Fugitive Dust Control Measure | Applicability and Appropriateness of Control Measure |
|---------------------------------------|---|---|
| Transportation of CCR at the facility | Condition CCR FGD materials to be emplaced in an offsite third-party owned/operated landfill before it is loaded into trucks for transport to the landfill. | Conditioning CCR increases moisture content of the CCR and minimizes the potential for CCR fugitive dust generation during CCR transport (and emplacement in the landfill). |
| | Add water to CCR fly ash at the loadout silo for on-site transport. | Wetting CCR fly ash reduces the potential for CCR fugitive dust generation during transportation on-site. Wetting activities will be conducted in a manner that does not generate "free liquids". |
| | CCR fly ash to be transported offsite is loaded into a fully enclosed pneumatic truck. | Use of a fully enclosed pneumatic truck minimizes the potential for CCR fugitive dust generation during transport. |
| | Cover or enclose trucks or containers used to transport CCR, as necessary. | Covering or enclosing trucks or containers transporting CCR minimizes the potential for CCR fugitive dust generation from the CCR transport trucks. |
| | Limit the speed of vehicles to no more than 15 mph on facility roads. | Limiting the speed of vehicles traveling on facility roads minimizes the potential for CCR fugitive dust generation from the CCR transport trucks. |
| | Sweep or rinse CCR off of the outside of the trucks transporting CCR, as necessary. | Removing CCR present on the outside of the truck minimizes the potential for movement of the truck or wind to cause CCR fugitive dust to become airborne. |
| | Remove CCR, as necessary, deposited on facility road surfaces during transport. | Removing CCR deposited on facility road surfaces as a result of transport minimizes the potential for CCR fugitive dust generation from vehicle traffic. |
| | Condition CCR haul roads with water or dust suppressant, as necessary. | Watering CCR haul roads minimizes the potential for dust generation to occur as a result of CCR hauling traffic and heavy equipment use. |
| | Reduce or halt operations during high wind events, as necessary. | Reducing or halting operations during high wind events minimizes the potential for CCR fugitive dust generation. |

Table 2-3. Control Measures for Transportation of CCR

3 Procedures for Periodic Assessment of Effectiveness of the Plan

The facility conducts inspections associated with CCR fugitive dust control. The facility also uses the procedures identified in Section 5 of this plan to log every citizen complaint 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 per 40 C.F.R. § 257.80(b)(4) and 35 I.A.C. 845.500(b)(3).

The facility routinely performs inspections to verify the effectiveness of the CCR fugitive dust control measures used at the facility. Inspections are conducted during daylight working hours and include observing for the presence of CCR fugitive dust emissions from vehicles transporting CCR on facility roads, CCR handling and CCR management activities, including CCR placement in CCR units. Inspection records include information such as the name of the person conducting the inspection, the date and time of the inspection, the results of the inspection, and any corrective action taken.

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 fugitive dust control 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.

4 Recordkeeping, Notification, Internet Site

The written CCR fugitive dust control plan, any amendment of the written plan, and the annual CCR fugitive dust control report required by 40 C.F.R. § 257.80(c) and 35 I.A.C. 845.500(c) will be placed in the facility's written operating record and posted to the company's CCR website in accordance with 40 C.F.R. § 257.105(g), § 257.107(g), and 845.800(d)(7), (14) and 845.810(e). 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 IEPA in accordance with 40 C.F.R. § 257.106(g). Any amendment of the fugitive dust control plan will be submitted to IEPA in accordance with 845.500(b)(5).

Additionally, pursuant to 845.500(b)(6), this fugitive dust control plan is being placed in facility's operating record and posted to the company's CCR website prior to the submission of any permits for the Baldwin Power Plant.

5 Procedures to Log Citizen Complaints

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
- Address & phone number of citizen entering the complaint
- 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. Pursuant to 35 I.A.C. 845.500(b)(2), quarterly reports will be submitted to IEPA no later than 14 days from the end of the quarter for all complaints received in that quarter. At a minimum, the quarterly report will include 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.

6 Amendments

The written CCR fugitive dust control plan may be amended at any time provided the revised plan is placed in the facility's operating record as required by 40 C.F.R. § 257.105(g)(1) and 845.500(b)(6). Any amendment of the fugitive dust control plan will be submitted to IEPA in accordance with 845.500(b)(5). 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.

| Amendment Number and Date | Pages or Section | Description of Amendment | Professional Engineer Certifying Plan |
|-----------------------------|------------------|---|---------------------------------------|
| Version 0 October 2015 | -- | Initial Plan | Wendy M. Pennington |
| Amendment 1 October 2021 | Various | Administrative changes and adjustments to site condition controls as appropriate. | John R. Hesemann |
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Table 6-1. CCR Fugitive Dust Control Plan Amendments