COAL COMBUSTION RESIDUALS

Fugitive Dust Control Plan

Plant Hammond December 19, 2019

Professional Engineer (P.E.) Certification:

Based upon my knowledge, information, and belief that the content in the attached Fugitive Dust Control Plan is accurate, I hereby certify that this Fugitive Dust Control Plan meets the requirements of 40 CFR § 257.80(b)(1)-(7) (Coal Combustion Residuals Rule).

Name: Richard T. Deason P.E. License No.: 27467

Expiration Date: December 31, 2020

Signature

Date

No. 27467

AMENDMENT SUMMARY

Date	Amendment #	Comments / Notes
4/10/17	1	Addition of AP-3 and revision of Section 5.
12/19/2019	2	Updating fugitive dust control measures in Section 5.2.

1.0 PURPOSE

The purpose of this plan is to demonstrate compliance with the fugitive dust requirements in 40 CFR § 257.80 (b)(1) through (7) of the Coal Combustion Residuals Final Rule. See 80 Fed. Reg. 21,302 (April 17, 2015).

2.0 SCOPE

This fugitive dust plan identifies and describes the Coal Combustion Residuals (CCR) fugitive dust control measures that Georgia Power Plant Hammond will use to minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. Coal combustion residuals are generated from the burning of coal to produce electricity and are defined as fly ash, bottom ash, boiler slag, and flue gas desulfurization (FGD) materials (i.e. gypsum).

3.0 REFERENCES

40 CFR §§ 257.53, 257.80, 257.105(g)(2)

4.0 GENERAL INFORMATION

EPA defines "fugitive dust" as "solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than through a stack, or chimney." 40 CFR § 257.53.

5.0 PROCEDURES

1) Identify the CCR units on plant site that are subject to the requirements in §257.80 to minimize CCR from becoming airborne. This should include all applicable CCR landfills, CCR surface impoundments, or any lateral expansion of a CCR unit.

Ash Pond 1 (AP-1) Ash Pond 2 (AP-2) Ash Pond 3 (AP-3)

Huffaker Rd Landfill, Cells A, B, and E

2) Identify and describe the fugitive dust control measures that are applicable and appropriate to minimize CCR from becoming airborne at the units listed in Section 5.0 (1) of this plan. This may include, for example, wet suppression using water or a chemical dust suppressant; locating CCR inside an enclosure or partial enclosure; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative cover; reducing or halting certain operations during high wind events (if possible), or applying a daily cover. For the purposes of this plan, wet suppression includes the use of water-spray equipment such as hoses, sprinklers, spray bars, water cannons, water trucks, or any other means of spraying or applying water, and may include the use of surfactants, wetting agents, or other additives.

Ash Pond 1 (AP-1): Fugitive dust is controlled by maintaining the level of the pond, water suppression, or vegetative growth.

Ash Pond 2 (AP-2): Fugitive dust is controlled by water suppression or vegetative growth.

Ash Pond 3 (AP-3): AP-3 has been capped in-place.

Huffaker Rd Landfill, Cells A, B, and E: Fugitive dust is controlled by water suppression or chemical dust suppressants, material compaction, limiting the active portion of the cell, and adding soil cover/capping or using a synthetic cover.

3) Explain how the control measures described in Section 5.0 (2) of this plan are applicable and appropriate for each CCR unit.

The fugitive dust control measures identified and described in this plan were adopted and implemented based upon an evaluation of site-specific conditions and are determined to be applicable and appropriate for the listed CCR units. The evaluation included assessing the effectiveness of the fugitive dust control measures for each CCR unit at the facility taking into consideration various factors such as site conditions, weather conditions, and operating conditions.

4) Describe the procedures to emplace CCR as conditioned CCR for any CCR landfill listed in Section 5.0 (1) of this plan. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.

Ash emplaced in the Huffaker Rd Landfill is conditioned to an appropriate moisture content to reduce the potential for fugitive dust before transporting it via truck to the landfill.

Gypsum emplaced in the Huffaker Rd Landfill is conditioned to an appropriate moisture content to reduce the potential for fugitive dust before transporting it via truck to the landfill.

5) Describe the fugitive dust control measures to minimize CCR from becoming airborne on roads and at other CCR management and material handling activities. This may include, for example, reducing vehicle speed limits; paving, wetting, or sweeping roads; covering trucks that transport CCR, or any of the control measures listed in Section 5.0 (2) of this plan.

Water suppression is used as needed to control fugitive dust on facility roads used to transport CCR and other CCR management areas.

Speed limits are utilized to reduce the potential for fugitive dust.

Paved roads on site are wet-swept as needed.

The gypsum storage barn is partially enclosed to reduce the potential for fugitive dust. Gypsum is partially dewatered to an appropriate moisture content to reduce the potential for fugitive dust before being placed in the gypsum storage barn.

Trucks used to transport ash and gypsum are filled at or under capacity to reduce the potential for material spillage.

Trucks used to transport ash and gypsum from Plant Hammond to Huffaker Rd Landfill are covered and the CCR material is conditioned to an appropriate moisture content to reduce the potential for fugitive dust.

A truck washing station is utilized at Plant Hammond and Huffaker Rd Landfill to clean CCR from trucks before they leave the facility.

6) Describe the procedures to periodically assess the effectiveness of the fugitive dust control measures described in this plan. This may include, for example, visual observations, inspections, written logs, etc.

Plant personnel assess the effectiveness of the control measures by performing visual observations of all CCR units and surrounding areas and implementing appropriate corrective actions for fugitive dust, as necessary. Logs are used to record the utilization of water-spray equipment.

7) Describe the procedure to log citizen complaints received involving CCR fugitive dust events at the facility.

When a complaint is received from a citizen regarding a CCR fugitive dust event at the facility, the complaint is documented and investigated. Appropriate steps are taken, including any corrective action, if needed.