

FUGITIVE DUST CONTROL PLAN

PLEASANTS LANDFILL

Willow Island, WV

Allegheny Energy Supply Company, LLC

A FirstEnergy Company

October 19, 2015

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INTRODUCTION

Pursuant to the Federal Coal Combustion Residuals (CCR) Rule at 40 CFR §257.80 each CCR unit is required to have a Fugitive Dust Control Plan that will effectively minimize CCR from becoming airborne from the CCR unit, roads leading to and from the CCR unit, and any other CCR management and material handling activities.

This plan must:

- 1) Identify and describe the CCR fugitive dust control measures that will be used to minimize CCR from becoming airborne at the facility, and explain how these measures are applicable and appropriate for the CCR unit;
- 2) Include procedures to emplace the CCR as conditioned CCR by means of wetting with water to a moisture content that will prevent wind dispersal but will not result in free liquids, or by means of a chemical dust suppression agent;
- 3) Include procedures to log citizen complaints received by the owner/operator involving fugitive dust events at the CCR unit;
- 4) Include a description of the procedures the owner/operator will follow to periodically assess the effectiveness of the control plan;
- 5) Be prepared as an initial plan for applicable CCR units by October 19, 2015, or by initial receipt of CCR for any unit subject to the regulation after October 19, 2015;
- 6) Include amendments to the plan whenever there is a change in conditions that would substantially affect the written plan in effect; and
- 7) Be certified by a qualified professional engineer, licensed in the state in which the CCR unit resides, that the initial CCR fugitive dust control plan, or any subsequent amendment thereto, meets the seven requirements as listed here per 40 CFR §257.80.

CCR UNIT DESCRIPTION

The Pleasants Landfill is an engineered CCR landfill located near the town of Willow Island, West Virginia, and is owned by Allegheny Energy Supply Company, LLC, a wholly owned subsidiary of FirstEnergy Corp. It is regulated by the West Virginia Department of Environmental Protection (WVDEP) under the West Virginia solid waste management regulations. The CCRs it receives from the Pleasants Power Station¹ are stabilized flue gas desulfurization (FGD) material, fly ash, and bottom ash not managed as a product. Bottom ash from the station is also managed as a product and is used as a landfill liner construction component (i.e. a permeable protective liner cover). The bottom ash managed as a product is not regulated by the CCR rule. The CCRs

¹ In addition, the WVDEP issued solid waste permit allows for disposal of fly ash and bottom ash (not managed as a product) from Fort Martin and Harrison Power Stations on an as needed basis. These CCRs are transported by trucks equipped with tarps.

destined for disposal in the landfill are transported by truck from the station via a private (non-public) haul road. At the landfill, the trucks unload the CCRs where it is placed in lifts and compacted by heavy equipment. These lifts comprise a series of benches that constitute the landfill. As a bench is finished it is contoured for positive drainage and the bench is covered with soil, seeded and mulched. All precipitation contacting the landfill material is collected and routed to a wastewater treatment pond that has a permitted outfall under the WVDEP National Pollution Discharge Elimination System (NPDES) regulations.

CCR FUGITIVE DUST CONTROL MEASURES

There are a series of dust control measures to control and minimize the dispersal of fugitive dust in the operation of the Pleasants Landfill.

1. Landfill Location and Natural Barriers

The Pleasants Landfill is located in a remote area of West Virginia with limited neighbors. It is constructed in a valley between two ridges and as such has a natural barrier of ridges and trees along the shoulders of the valley. These natural barriers reduce the exposure of wind to the landfill, thus minimizing the potential for fugitive dust from the site.

2. Truck Loading

The stabilized FGD material generated at the station has a latent moisture content of approximately 20 to 30 percent, thus the material has sufficient water to keep it from dispersing in the wind when being transferred from the truck loading silo to the haul trucks. In addition, the fly ash and bottom ash that are transferred to the landfill via truck are conditioned with water at the time of truck loading so as to minimize the production of airborne fugitive dust.

3. Haul Road

The filled trucks then drive on a dedicated (non-public) paved haul road up to the point of the landfill's working area where the trucks then traverse a specified "lane" on the placed and compacted material to the point of the active face unloading area. The haul road and (when weather conditions dictate) the placed and compacted material that is traversed by the haul trucks, is wetted by a water truck. The water truck keeps the paved haul road wetted during the daily hauling shift when there is no natural precipitation. On particularly dry days or if excess solids accumulate on the paved road surface (for example after a heavy downpour that causes gravel and solids to wash over the top of drainage ditches across the road surface) the road is also cleaned by a sweeper vacuum truck to remove the solids that

could get crushed under the weight of the haul trucks and form airborne dust. Watering of the road is kept to a minimum during winter months to prevent the formation of ice. In addition, due to the weight of the trucks and the grade of the road, truck speed is maintained around 25 miles per hour or less (particularly with full payload) so as to minimize the dispersal of road dust by the movement of the vehicles over the road surface.

4. Landfilling Process

As stated in item 2 above, the CCR material has sufficient moisture, as an inherent property of production or by intentional conditioning, to minimize its dispersion as fugitive dust. The material is mechanically compacted essentially forming a large monolithic bench of material that has limited surface area (outer lift slope and bench surface) from which fugitive dust can be generated. When a bench is completed, it is covered with soil, seeded and mulched. Once vegetated the production of fugitive dust is minimized to its maximum extent.

5. Suspension of Operations During Severe Weather Conditions

Due to the composition of the CCR material, weather conditions producing excessive precipitation may halt disposal operations because the operating face of the landfill will become too slick for safe operation of trucks and equipment. Despite any accompanying high winds during these weather conditions the material is far too wet to disperse in the wind. Likewise, operations may also halt during extremely cold temperatures because the material can freeze. High wind conditions (without precipitation) also may temporarily halt landfill operations. If these weather conditions persist for extended periods (days) the CCRs can be stored in the various collection and process silos and/or a dome enclosure at the station proper.

APPLICABILITY AND APPROPRIATENESS OF DUST CONTROL MEASURES

The dust control measures described in this plan are applicable and appropriate as accepted industry best management practices and reasonable engineering controls for industrial landfill operations. Moreover, these measures, practices, and controls are recognized by the United States Environmental Protection Agency (US EPA) as discussed in the "Compilation of Air Pollutant Emission Factors" document (AP-42) detailing fugitive dust emission calculations under uncontrolled and controlled scenarios.²

² AP-42 was first published in 1968 by the U.S. Public Health Service, and was then revised and reissued by the U.S. EPA in 1972. It is currently available as the 1995 Fifth Edition. Fugitive dust is specifically addressed in Chapter 13, Miscellaneous Sources.

PROCEDURE FOR EMPLACEMENT OF CONDITIONED CCR

As described above, the CCR material placed in the Pleasants Landfill has sufficient moisture, as an inherent property of production or by intentional conditioning, to prevent dispersal of fugitive dust in accord with the requirement in the federal CCR rule [40 CFR §257.80(b)(2)].

PROCEDURE TO LOG CITIZEN COMPLAINTS

The station maintains a fugitive dust complaint log. Any complaint that is phoned into the station is recorded on the appropriate log including date, time, name of party lodging complaint, a description of the complaint, and ambient weather conditions at the time the complaint is made. The appropriate station personnel are then notified to verify the continued occurrence of the complaint and the manner in which the issue is to be resolved. These actions are also recorded in the citizen complaint log. If the complaint involves a claim of damage, a company representative contacts the party lodging the complaint to resolve the citizen's claim. A copy of the log is provided as Attachment A to this plan.

PROCEDURE TO ASSESS CONTROL PLAN EFFECTIVENESS

The Pleasants Landfill is a permitted facility under the applicable regulations of West Virginia. As such there are existing permit conditions that require the logging of certain activities undertaken to minimize the creation of fugitive dust. In the case of the Pleasants Landfill, for example, these permit conditions control the amount of fugitive dust potentially created by the operation by limiting both the amount of CCRs that can be hauled to the landfill as well as the hours of operation of the CCR placement equipment (dozers). In addition, the station's Title V permit requires the submission to the WVDEP of an annual emissions inventory, including fugitive dust emissions from the landfill operation. These conditions, limitations, reports, and citizen complaint log will be reviewed to evaluate the effectiveness of the measures taken and practices put in place to minimize the dispersal of fugitive dust.

DATE OF INITIAL PLAN

Since the Pleasants Landfill is an existing CCR landfill (per 40 CFR §257.53) that is receiving CCRs both before and after October 19, 2015, the initial CCR fugitive dust control plan must be prepared and placed in the operating record by October 19, 2015. The CCR fugitive dust control plan will be placed on the facility's CCR website within 30 days of placing the information in the operating record. The facility will also notify the State Director within 30 days of when the plan is placed in the operating record.

PLAN AMENDMENTS PROCEDURE

The plan will be amended in response to limitations identified during the annual plan review, or if operational or facility changes warrant an update. When changes are made, the title page of the amended plan shall include a notation identifying the date of the initial plan as well as the date of all subsequent revisions. The amendments made to the plan will be identified in an amendment table, attached hereto as Attachment B, identifying the date of the amendment, the reason for the amendment and the sections of the plan amended.

QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

Pursuant to 40 CFR §257.80(b)(7) the initial fugitive dust control plan and any subsequent amendment of it will be certified by a qualified professional engineer (PE). A copy of the certification is attached hereto as Attachment C.

ANNUAL CCR FUGITIVE DUST CONTROL REPORT

The annual fugitive dust control report will include a description of the actions taken by the facility to control CCR fugitive dust and a record of all citizen complaints logged in the previous twelve months along with corrective measures taken, if any. The initial CCR fugitive dust control report will be completed no later than 14 months after the initial CCR fugitive dust control plan has been placed in the operating record. Subsequent reports will be completed and placed in the operating record within one year of completing the previous year's report.

RECORDKEEPING REQUIREMENTS

As required by the CCR Rule, the CCR fugitive dust control plan and annual CCR fugitive dust control report will be placed in the facility's operating record. As the CCR fugitive dust control report is amended, the most recent version of the plan will be maintained in the facility's operating record. Both the most recent version of the CCR fugitive dust control plan and the annual CCR fugitive dust control report will be placed on the facility's CCR website within 30 days of placing the information into the operating record.

ATTACHMENT A

CITIZEN COMPLAINT LOG

ATTACHMENT B

PLAN AMENDMENTS SUMMARY TABLE

ATTACHMENT C

QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

Professional Engineer Certification - As required by the U.S. EPA CCR Rule 40 CFR Parts 257 and 261

§257.80 - Air Criteria

CCR Fugitive Dust Control Plan

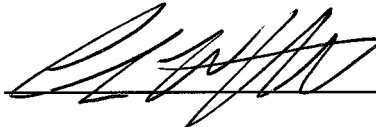
CCR Unit: Pleasants Landfill

Certification:

I, Adam W. Hoalcraft, a registered professional engineer in the state of West Virginia certify that this Fugitive Dust Control Plan fulfills the minimum requirements of 40 CFR §257.80(b)(1) through §257.80(b)(7), as applicable. This certification is based on my review of the Pleasants Landfill Fugitive Dust Control Plan and operational information and/or data provided (but not independently verified for accuracy) by FirstEnergy about the CCR Unit listed above.

Printed Name: Adam W Hoalcraft

PE License Number: 20503 State: WV

Signature: 

Date: 10/15/2015

Seal:

Stamp:

