

Fugitive Dust Control Plan Former Mad River Ash Pond

Ohio Edison Company
Former Mad River Power Station
Clark County, Ohio

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Certification/Statement of Professional Opinion

The Fugitive Dust Control Plan (Plan) for the former Mad River Ash Pond at the former Mad River Power Station was prepared by GAI Consultants, Inc. (GAI). It is my professional opinion as a Professional Engineer licensed in the State of Ohio that the Plan has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, and at the same time and in the same locale. It is my professional opinion that the Plan was prepared consistent with the requirements of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments", published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 and amended on May 8, 2024 with an effective date of November 8, 2024.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion, and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.



Seal

11/7/2024
Date

1.0 Introduction

The former Mad River Ash Pond (Ash Pond) is a legacy coal combustion residuals (CCR) surface impoundment located approximately 0.15 miles southeast of the former Mad River Power Station (Station), an inactive electric utility located in the city of Springfield in Clark County, Ohio (OH).

In accordance with the applicable requirements of the United States Environmental Protection Agency's 40 Code of Federal Register (CFR) Part 257, Subpart D, *Criteria for Classification of Solid Waste Disposal Facilities and Practices* (CCR Rule), the owner or operator of a CCR unit must adopt measures that will effectively 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.

This Fugitive Dust Control Plan (Plan) was prepared in accordance with the applicable requirements at §257.100(f)(3)(i) and §257.80(b) of the CCR Rule. The purpose of this Plan is to provide provisions to minimize and/or avoid potential adverse environmental impacts due to fugitive CCR dust. This Plan sets forth the techniques that will be utilized to control dust emissions at the former Ash Pond. The initial CCR Fugitive Dust Control Plan must be prepared by November 8, 2024.

The former Ash Pond was used for the management of CCR when the Station operated as a coal-fired generating facility. The Station began operating in 1926 and ceased generating electricity in 1982. The former Ash Pond no longer receives CCR and is currently vegetated.

2.0 Initial CCR Fugitive Dust Control Plan [§257.80(b)(1)]

Sections 257.80(b) and 257.100(f) of the CCR Rule requires the Plan identify and describe the CCR fugitive dust control measures that will be used to minimize CCR from becoming airborne at the facility. The most appropriate fugitive dust control measures for site conditions must be selected, along with an explanation of how the measures selected are applicable and appropriate for site conditions.

The former Ash Pond has not been used for CCR disposal recently, and the area is currently vegetated. Because no active placement is occurring or proposed to occur, fugitive dust measures related to placement and transportation of CCR (e.g., reducing fall distances at material drop points, compaction, establishing and enforcing reduced vehicle speed limits, paving and sweeping roads, covering trucks transporting CCR, placing CCR inside an enclosure or partial enclosure, reducing or halting operations during high wind events, or applying a daily cover) do not apply.

Presently, the former Ash Pond is vegetated. If bare conditions that have the potential to create CCR fugitive dust are noted during inspections, corrective actions, such as re-vegetation will be implemented. Should conditions warrant further dust control, measures such as water spraying systems and/or wind barriers will be considered. Should any change to the current site conditions due to closure or compliance with the CCR Rule occur, the Plan will be reviewed and updated accordingly to mitigate any CCR fugitive dust.

3.0 Provisions Related to CCR Landfill Placement [§257.80(b)(2)]

Per Section 257.80(b)(2) of the CCR Rule, the Plan must include procedures to emplace CCR as conditioned CCR if operating a CCR landfill or any lateral expansion of a CCR landfill. The former Ash Pond is not a landfill, and no active placement of CCR is currently occurring or proposed to occur in the future.

4.0 Citizen Complaint Log [§257.80(b)(3)]

Per Section 257.80(b)(3) of the CCR Rule, the Plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility. Appendix A contains a citizen complaint log, which will be used to document any citizen complaints involving CCR fugitive dust received. The citizen's complaint log shall be completed within 24 hours of receiving the complaint to document the complaint.

5.0 Plan Effectiveness Assessment [§257.80(b)(4)]

Per Section 257.80(b)(4), the Plan must include a description of the procedures that will be taken to periodically assess the effectiveness of the Plan. The Plan will be reviewed and the effectiveness will be assessed at a minimum frequency of once per calendar year. The procedures for assessing the effectiveness will include the following:

- ▶ Review 7-day monitoring checklists;
- ▶ Review complaint log; and
- ▶ Incorporate any lessons learned during the previous year into the written plan.

6.0 Plan Amendment [§257.80(b)(6)]

Per Section 257.80(b)(6) of the CCR Rule, the initial Plan can be amended at any time and must be amended no later than 30 days whenever there is a change in conditions that would substantially affect the written plan in effect, such as construction and operation of a new CCR unit or change in operation of an existing CCR unit. The amended Plan(s) must be included into the facilities operating record per Section 257.105(g)(1) of the CCR Rule. Any future amendments to this initial Plan will be done in accordance with the applicable sections of the CCR Rule.

7.0 Annual CCR Fugitive Dust Control Report [§257.80(c)]

An Annual CCR Fugitive Dust Control Report (FDCR) must be prepared, detailing a description of activities taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual FDCR shall be completed no later than 14 months after placing the initial Plan in the facility's operating record. Each subsequent FDCR must be completed one year after the date of completing the previous FDCR. The Annual FDCR must be included into the facility's operating record as required by §257.105(g)(2).

8.0 Recordkeeping Requirements [§257.80(d)]

The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(g), the notification requirements specified in §257.106(g), and the internet requirements specified in §257.107(g).

APPENDIX A

Citizen's Complaint Log

Fugitive Dust Citizen Complaint Log

Former Mad River Power Station

Date: _____

Time: _____

Owner or Operator Representative in Receipt of a Citizen Complaint:

Title: _____

Address: _____

Phone: _____

Name of Person Filing Complaint: _____

Contact Information: _____

Location Description: _____

Complaint: _____

Immediate Corrective Action(s) Taken (if any): _____
