

COAL COMBUSTION RESIDUALS RULE

Fugitive Dust Control Plan

Plant Smith
10/19/2015

Professional Engineer Certification:

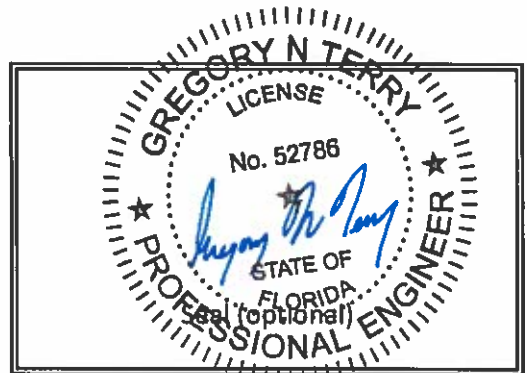
[Professional Engineer Certification Statement - To be completed by the P.E.]

GREGORY N. TERRY

Date: October 15, 2015

Greg N. Terry, FL No. 52786, Expires 02/28/2017

Gregory N. Terry
Signature



Based upon my knowledge, information and belief that the content in the attached Fugitive Dust Control is accurate, I hereby certify that this Fugitive Dust Control Plan meets the requirements of 40CFR257.80(b)(1)(7), Coal Combustion Residuals Rule.

AMENDMENT SUMMARY

Date	Amendment #	Comments / Notes

1.0 PURPOSE

The purpose of this plan is to identify measures that may be taken to minimize Coal Combustion Residuals (CCR) from becoming airborne at the facility and to log any citizen complaints in accordance with requirements in 40 CFR § 257.80 (b)(1) through (7) of the CCR Final Rule.

2.0 SCOPE

This fugitive dust plan identifies and describes the (CCR) fugitive dust control measures that Plant Smith may 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. CCRs 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.

3.0 REFERENCES

Section §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 at the facility 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.

CCR surface impoundment

- 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.

A water suppression truck is used to wet the roads in the immediate vicinity of the CCR surface impoundment. Speed limits are posted to reduce vehicle speed on all roads. Fugitive emissions at Plant Smith are also regulated under the facility's Title V Air Permit.

- 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 over time 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.

Not applicable

- 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.

A water suppression truck is used to wet on-site roads and those surrounding the CCR surface impoundment. Speed limits are posted to reduce vehicle speeds on all roads.

- 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.

The effectiveness of the fugitive dust control measures is assessed through periodic visual observations conducted by the plant's Environmental Compliance Personnel. Annual awareness training is conducted to ensure all plant personnel timely report any fugitive dust issues to the plant's Environmental Compliance Personnel. Any fugitive dust issue discovered will be addressed appropriately.

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

All citizen complaints received by Plant Smith or Gulf Power are forwarded to the Gulf Power Environmental Affairs Department for coordination and action. Each complaint will be logged.