CCR Fugitive Dust Control Plan 40 CFR 257.80(b)

The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. 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.

(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. The owner or operator has completed the initial CCR fugitive dust control plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(1).

(6) Amendment of the plan. The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

(7) 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 this section.

TRANSALTA CENTRALIA MINING LLC

LIMITED PURPOSE LANDFILL, INITIAL FUGITIVE DUST CONTROL PLAN

1. Identification and Description of Fugitive Dust Control Measures

TransAlta Centralia Mining LLC (TCM) has selected applicable and appropriate fugitive dust control measures to satisfy the Coal Combustion Residual rule at 40 CFR 257.80(b). These measures have been determined to be the most appropriate for TCM's Limited Purpose Landfill (LPLF) and consist of:

- Access Road/Haulage Road Dust can be created while transporting CCR material to the LPLF. Road dust will be controlled through proper road design and construction. Periodic grading will be conducted to remove debris and maintain an adequate operating surface. Watering of the road surface is the primary dust control measure available for site conditions and is most appropriate for haul road management. The application of traction rock will be conducted as necessary during dry and/or windy periods of the year when hauling operations are occurring. The manager of landfill operations will halt haulage and placement operation if fugitive dust control measures are not effective during extreme wind conditions.
- 2. Landfill Operations Fill lift construction will be approximately 10 feet deep. End dump trucks place their load in piles and dozers push the conditioned CCR material into its final placement. This process minimizes the generation of dust from the CCR material as it is placed in the landfill. Placement of CCR material, primarily fly ash, in the landfill has the potential to generate dust and will be controlled, as needed, by watering the surface of the dump while spreading and compaction operations are being conducted. The CCR material will be compacted by the large rubber-tired trucks hauling the CCR material to the landfill and by the large dozers that spread the material.
- 3. Landfill Cover Based on operating experience, daily cover of CCR material is not needed for dust control. Once the material is in place and compacted fugitive dust is not an issue. As lifts are completed, an intermediate cover consisting of approximately 12 inches of mine spoils will be placed, covering the CCR material.

2. **Procedures for Emplacement as a conditioned CCR**

CCR material is wetted as it exits the hopper at the point of origination. The conditioned CCR material will prevent wind dispersal during transport to the LPLF and while placing the CCR material. The wetting of the CCR material will not result in free liquids being placed in the LPLF.

3. **Procedures for Logging Citizen Complaints**

The TCM LPLF will take complaints involving CCR fugitive dust over the telephone or by mail. Any complaint will be logged into a complaint form and the manager of landfill operations will be notified. The landfill manager will ensure that fugitive dust control measures are functioning and implement corrective measures as necessary. The complaint form will be placed in the operating record.

4. Procedures for Assessing the Effectiveness of this Plan

TCM will routinely (no less than once per week) monitor the effectiveness of this dust control plan by traveling the haulage route from the CCR source to the LPLF, and the perimeter access at the LPLF. The monitoring will consist of a visual inspection (documented on an inspection form) of the haul road conditions (how much road dust is being generated), if any haulage of CCR waste is being conducted (is there dust coming from the transport equipment), and the conditions at the LPLF (is dust being generated from active operating areas or areas where CCR materials have been deposited). If these observations indicate that there is a potential for dust, TCM will immediately notify the manager of landfill operations and request the application of additional dust control measures identified in parts 1 and 2 of this plan. The weekly inspection form will be kept in the operating record.

CERTIFICATION OF ENGINEER:

I, Steven J. Mahr, registered professional engineer in the State of Washington hereby certifies that the CCR Fugitive Dust Control Plan presented herein meets the requirements of 40 CFR Section 257.80(b).

