

# Fugitive Dust Control Plan Spurlock Power Plant



East Kentucky Power Cooperative

Coal Combustion Residual Rule Compliance

Rev. 2  
September 6, 2023

# Fugitive Dust Control Plan Spurlock Power Plant

Prepared for

East Kentucky Power Cooperative  
Coal Combustion Residual Rule Compliance  
Maysville, Kentucky

Rev. 2  
September 6, 2023

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## INDEX AND CERTIFICATION

### East Kentucky Power Cooperative Fugitive Dust Control Plan Spurlock Power Plant

#### Report Index

<u>Chapter Number</u>	<u>Chapter Title</u>	<u>Number of Pages</u>
1.0	Introduction	1
2.0	Plan Objectives	1
3.0	Fugitive Emission Sources and Controls	16
4.0	Procedures for Logging Citizen Complaints	1
5.0	Periodic Assessment and Annual Report	1
6.0	Record of Revisions and Updates Made to Plan	1
Appendix A	Site Map of Fugitive Dust Sources Included in Plan	2
Appendix B	Fugitive Dust Citizen Complaint Documents	3

#### Certification

I hereby certify, as a Professional Engineer in the Commonwealth of Kentucky, that the information in this document was assembled under my direct personal charge. This report is not intended or represented to be suitable for reuse by the East Kentucky Power Cooperative or others without specific verification or adaptation by the Engineer. I hereby certify that this Fugitive Dust Control Plan for CCR Units at Spurlock Power Plant was prepared in accordance with standard engineering practices, and based on my knowledge, information, and belief, the content of the Spurlock Power Plant's Fugitive Dust Control Plan is true and meets the requirements of 40 CFR § 257.80.

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Dallen Kroger, P.E. (KY #32835)

Date: 9/6/2023

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## TABLE OF CONTENTS

	<u>Page No.</u>
<b>1.0 INTRODUCTION .....</b>	<b>1-1</b>
<b>2.0 PLAN OBJECTIVES .....</b>	<b>2-1</b>
<b>3.0 FUGITIVE EMISSION SOURCES AND CONTROLS .....</b>	<b>3-1</b>
3.1 U1 & U2 Fly Ash Load Out.....	3-1
3.2 U3 Bed Ash Silo Load Out .....	3-3
3.3 U3 Fly Ash Silo Load Out .....	3-4
3.4 U4 Bed Ash Silo Load Out .....	3-5
3.5 U4 Fly Ash Silo Load Out .....	3-6
3.6 Gypsum Waste .....	3-7
3.7 Ash Pond.....	3-8
3.8 Spurlock and Peg’s Hill Landfills.....	3-9
3.9 Hauling to Landfills .....	3-10
3.10 U1/U2 Bottom Ash Silo Load Out.....	3-11
3.11 New U1/U2 Fly Ash Silo Load Out.....	3-13
3.12 Vacuum Truck Ash Handling Station & Load Out .....	3-14
3.13 Filter Press and Filter Press Truck Load Out.....	3-15
<b>4.0 PROCEDURES FOR LOGGING CITIZEN COMPLAINTS .....</b>	<b>4-1</b>
<b>5.0 PERIODIC ASSESSMENT AND ANNUAL REPORT .....</b>	<b>5-1</b>
<b>6.0 RECORD OF REVISIONS AND UPDATES MADE TO PLAN.....</b>	<b>6-1</b>
<b>APPENDIX A - SITE MAP OF FUGITIVE DUST SOURCES INCLUDED IN PLAN</b>	
<b>APPENDIX B - FUGITIVE DUST CITIZEN COMPLAINT DOCUMENTS</b>	

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## LIST OF TABLES

	<u>Page No.</u>
Table 3-1: Fugitive Emission Sources .....	3-1
Table 3-2: U1&U2 Fly Ash Load Out Control Measures .....	3-2
Table 3-3: U3 Bed Ash Silo Load Out Control Measures .....	3-3
Table 3-4: U3 Fly Ash Silo Load Out Control Measures .....	3-4
Table 3-5: U4 Bed Ash Silo Load Out Control Measures .....	3-6
Table 3-6: U4 Fly Ash Silo Load Out Control Measures .....	3-7
Table 3-7: Gypsum Waste Control Measures .....	3-8
Table 3-8: Ash Pond Control Measures .....	3-9
Table 3-9: Spurlock and Peg's Hill Landfill Control Measures .....	3-10
Table 3-10: Hauling to Landfills Control Measures .....	3-11
Table 3-11: U1/U2 Bottom Ash Silo Load Out Control Measures .....	3-12
Table 3-12: New U1/U2 Fly Ash Silo Load Out Control Measures .....	3-14
Table 3-13: Vacuum Truck Ash Handling Station Load Out Control Measures .....	3-15
Table 3-14: Filter Press Truck Load Out Control Measures .....	3-16

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## LIST OF FIGURES

	<u>Page No.</u>
Figure 3-1: Spurlock U1&U2 Fly Ash Load Out.....	3-2
Figure 3-2: U3 Bed Ash Loading Operation.....	3-3
Figure 3-3: U3 Fly Ash Truck Loading Operation .....	3-4
Figure 3-4: U4 Bed Ash Loading Operation.....	3-5
Figure 3-5: U4 Fly Ash Loading Operation.....	3-6
Figure 3-6: Gypsum Pile and Load Out Operations.....	3-8
Figure 3-7: Ash Pond .....	3-9
Figure 3-8: Truck Unloading at Landfill.....	3-10
Figure 3-9: Landfill Watering Trucks .....	3-11
Figure 3-10: U1/U2 Bottom Ash Loading Operation.....	3-12
Figure 3-11: New U1/U2 Fly Ash Silo Loading Operation.....	3-13
Figure 3-12: Vacuum Truck Ash Handling Station Loading Operation.....	3-14
Figure 3-13: Filter Press Truck Load Out.....	3-15

## LIST OF ABBREVIATIONS

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
CCR	Coal Combustion Residual
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CMMS	Computer Maintenance Management System
EKPC	East Kentucky Power Cooperative
EPA	Environmental Protection Agency
EU	Emission Unit
RCRA	Resource Conservation and Recovery Act
U.S.C.	United States Code
U	Unit

## LIST OF TERMS/DEFINITIONS

Environmental – Refers to the specific division within EKPC management that handles environmental concerns and permits.

CCR fugitive dust – Refers to solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney.

## 1.0 INTRODUCTION

On April 17, 2015, the Environmental Protection Agency (EPA) issued the final version of the federal Coal Combustion Residual Rule (CCR Rule) to regulate the disposal of coal combustion residual (CCR) materials generated at coal-fired units. The rule will be administered as part of the Resource Conservation and Recovery Act [RCRA, 42 United States Code (U.S.C.) §6901 et seq.], using the Subtitle D approach.

East Kentucky Power Cooperative (EKPC) is subject to the CCR Rule and as such must develop a Fugitive Dust Control Plan per 40 Code of Federal Regulations (CFR) §257.80. This report provides the Fugitive Dust Control Plan for the Spurlock Power Plant located in Maysville, Kentucky.

Possible control measures from 40 CFR §257.80, which were considered, include:

- Locating CCR inside an enclosure or partial enclosure;
- Operating a water spray or fogging;
- Reducing fall distances at material drop points;
- Using wind barriers (enclosures), compaction, or vegetative covers;
- Establishing and enforcing reduced vehicle speed limits;
- Paving and sweeping roads;
- Covering trucks that are transporting CCR;
- Reducing or halting operations during high wind events; or
- Applying a daily cover.

The above control measures, which are noted from 40 CFR §257.80 of the CCR Rule, may be appropriate dust control measures for emission points. Not all the above measures are appropriate for the emission points indicated in Section 3. Those control measures not indicated in Section 3, but noted above, may still be applied at the Owner/Operator's discretion if all other specific control measures have failed to reduce fugitive dust emissions.

This Fugitive Dust Plan is in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act or the Clean Air Act.



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## 2.0 PLAN OBJECTIVES

The Fugitive Dust Control Plan identifies specific control measures in Section 3 that EKPC will use to control and minimize fugitive dust emissions at emission points within the facility from becoming airborne as required by the CCR Rule. The plan additionally defines the following:

- Procedures that EKPC personnel will follow to control emissions,
- Means and methods that should be followed to bring emissions within appropriate ranges,
- Specific means and methods that EKPC will take to demonstrate that corrective procedures are followed and to verify the facility is controlling fugitive emissions, and
- Procedure for addressing fugitive dust complaints and subsequent corrective actions.

To meet these objectives, the Fugitive Dust Control Plan:

- Identifies all fugitive emission sources at the facility,
- Identifies the primary and contingent control measures and practices to control and minimize fugitive emissions,
- Identifies means to conduct visible emission observations and subsequent means and methods for corrective actions,
- Identifies fugitive dust control recordkeeping requirements,
- Identifies fugitive dust control notification requirements,
- Identifies that EKPC has fugitive dust control training elements within their infrastructure although not required by the CCR Rule,
- Provides details on completing the Annual Fugitive Dust Report, and
- Provides a process to address fugitive dust complaints from citizens.

### 3.0 FUGITIVE EMISSION SOURCES AND CONTROLS

The operating practices and control measures that will be implemented and recorded for the fugitive dust sources identified in Table 3-1 are described below. EKPC assigns appropriate personnel the responsibility to monitor and control fugitive emissions in their areas of responsibility.

Table 3-1 lists the fugitive emission sources identified at the facility.

**Table 3-1: Fugitive Emission Sources**

Source Name	Description
U1 & U2 Fly Ash Load Out	Load out operation into truck for transfer to landfill
U3 Bed Ash Silo Load Out	Load out operation into truck for transfer to landfill
U3 Fly Ash Silo Load Out	Load out operation into truck for transfer to landfill
U4 Bed Ash Silo Load Out	Load out operation into truck for transfer to landfill
U4 Fly Ash Silo Load Out	Load out operation into truck for transfer to landfill
Gypsum Waste	Temporarily stored in pile prior to transportation to the landfill
Ash Pond	Storage of CCR material
Spurlock and Peg’s Hill Landfills	Used for long term storage of CCR waste
Hauling to Landfill	Roads used to transport CCR waste to the landfill
U1 & U2 Bottom Ash Silo Load Out	Load out operation into truck for transfer to landfill
U1 & U2 New Fly Ash Silo Load Out	Load out operation into truck for transfer to landfill
Vacuum Truck Ash Handling Station	Load out operation into truck for transfer to landfill
Filter Press and Filter Press Truck Load Out	Press and load out operation into truck for transfer to landfill

Training is provided by EKPC Environmental at the site every twice a year and includes a section on taking action to prevent fugitive emissions. This training is conducted for appropriate operations personnel.

The following fugitive dust sources are located at the Spurlock Station as described herein.

#### 3.1 U1 & U2 Fly Ash Load Out

Identification: Truck load out from Unit 1 & 2 Fly Ash Silos is transported to the landfills via dump truck. It is shown in Appendix A as Item 1 and pictured in Figure 3-1. Dust control measures are described in Table 3-2. Maintenance records are kept in Computer Maintenance Management System (CMMS).

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-1: Spurlock U1&U2 Fly Ash Load Out**



**Table 3-2: U1&U2 Fly Ash Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Controlling the flow rate	A smooth, homogenous flow of materials reduces surface disturbances and reduces the amount of dust generated.
Using telescopic chutes	In the event the mixers are not functioning to condition the ash during dry load out, a telescopic chute shall be used to reduce the distance that the material travels while exposed to open air which will aid to minimize dust created by the drop into the truck.
Using skirting	Skirting helps keep dust inside the structure during loading into the truck.

### 3.2 U3 Bed Ash Silo Load Out

Identification: Truck load out from Unit 3 Bed Ash Silo is transported to the landfills via bulk tank truck or dump truck. It is shown in Appendix A as Item 2 and pictured in Figure 3-2. The dust control measures are described in Table 3-3. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-2: U3 Bed Ash Loading Operation**



**Table 3-3: U3 Bed Ash Silo Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Using telescopic chutes	A telescopic chute shall be used to reduce the distance that the material travels while exposed to open air which will aid to minimize dust created by the drop into the truck.
Using bulk tank trucks	A closed truck will prevent fugitive dust from escaping during loading and travel.

### 3.3 U3 Fly Ash Silo Load Out

**Identification:** Truck load out from Unit 3 Fly Ash Silo is transported to the landfills via dump truck. It is shown in Appendix A as Item 3 and pictured in Figure 3-3. Dust control measures are described in Table 3-4. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-3: U3 Fly Ash Truck Loading Operation**



**Table 3-4: U3 Fly Ash Silo Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Controlling the flow rate	A smooth, homogenous flow of materials reduces surface disturbances and reduces the amount of dust generated.

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Using telescopic chutes	In the event the mixers are not functioning to condition the ash, during dry load out, a telescopic chute shall be used to reduce the distance that the material travels while exposed to open air which will aid to minimize dust created by the drop into the truck.
Using skirting	Skirting helps keep dust inside the structure during loading into the truck.

### 3.4 U4 Bed Ash Silo Load Out

Identification: Truck load out from Unit 4 Bed Ash Silo is transported to the landfills via bulk truck or dump truck. It is shown in Appendix A as Item 4 and pictured in Figure 3-4. Dust control measures are described in Table 3-5. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-4: U4 Bed Ash Loading Operation**



**Table 3-5: U4 Bed Ash Silo Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Controlling the flow rate	A smooth, homogenous flow of materials reduces surface disturbances and reduces the amount of dust generated.
Using telescopic chutes	A telescopic chute shall be used to reduce the distance that the material travels while exposed to open air which will aid to minimize dust created by the drop into the truck.
Using bulk tank trucks	A closed truck will prevent fugitive dust from escaping during loading and travel.

### 3.5 U4 Fly Ash Silo Load Out

Identification: Truck load out from Unit 4 Fly Ash Silo is transported to the landfills via dump truck. It is shown in Appendix A as Item 5 and pictured in Figure 3-5. Dust control measures are described in Table 3-6. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-5: U4 Fly Ash Loading Operation**



**Table 3-6: U4 Fly Ash Silo Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Controlling the flow rate	A smooth, homogenous flow of materials reduces surface disturbances and reduces the amount of dust generated.
Using telescopic chutes	In the event the mixers are not functioning to condition the ash, during dry load out, a telescopic chute shall be used to reduce the distance that the material travels while exposed to open air which will aid to minimize dust created by the drop into the truck.
Using skirting	Skirting helps keep dust inside the structure during into the truck.

### 3.6 Gypsum Waste

Identification: Gypsum waste is stored in a pile and loaded via a loader into a dump truck for transportation to the landfills. It is shown in Appendix A as Item 6 and pictured in Figure 3-6. Dust control measures are described in Table 3-7. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.



**Figure 3-6: Gypsum Pile and Load Out Operations**



**Table 3-7: Gypsum Waste Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Removal of waste to landfill	Removal of gypsum waste to the landfill prevents dust buildup.

### 3.7 Ash Pond

Identification: The Ash Pond is used to store CCR waste that is transferred to landfills via a dump truck. It is shown in Appendix A as Item 7 and pictured in Figure 3-7. Dust control measures are described in Table 3-8. Maintenance records are kept in the CMMS. Fugitive dust emissions could result from the unloading and removal of CCR waste from the pond.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-7: Ash Pond**



**Table 3-8: Ash Pond Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed at the bottom ash loading area	The application of water suppresses dust formation. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Free liquids resulting from wetting is allowed as long as drainage is back to the pond. Wetting is only needed if fugitive dust emissions are deemed outside of the Pond vicinity.
Remove CCR to Landfill	Any fugitive dust noted in temporary piles could be addressed by removing the CCR and hauling it in covered trucks to the landfill.

### 3.8 Spurlock and Peg’s Hill Landfills

Identification: The Spurlock and Peg’s Hill Landfills are used for long term storage of CCR waste. It is shown in Appendix A as Item 8 for Spurlock and Peg’s Hill Landfill. Dust control measures are described in Table 3-9 and shown in Figure 3-8. Maintenance records are maintained by the landfill contractor. Fugitive dust emissions result from wind erosion, material loading/unloading (i.e., mechanical disturbance), work performed moving CCR material, and capping the landfill.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-8: Truck Unloading at Landfill**



**Table 3-9: Spurlock and Peg’s Hill Landfill Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Landfill final cover system	Once the landfill CCR reaches its final elevation, it will be closed with a cover system as indicated in the Kentucky Division of Waste Management Permit.

### 3.9 Hauling to Landfills

Identification: Roads are used by trucks to transport CCR waste to either Spurlock or Peg’s Hill landfills. It is shown in Appendix A as Item 9. Dust control measures are described in Table 3-10 and shown in Figure 3-9. Maintenance records are maintained by the landfill contractor.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-9: Landfill Watering Trucks**



**Table 3-10: Hauling to Landfills Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Control vehicle speed	Haul road emissions are generated by the disturbance of dust caused by moving traffic. Slower traffic creates less dust.
Cover trucks	The ash trucks shall be covered with a tarp during transportation to the landfill. This reduces the amount of dust that is generated by wind passing over the hauled material due to the motion of the truck.
Limit vehicle traffic	Landfill haul roads are labeled to reduce unnecessary traffic.

### 3.10 U1/U2 Bottom Ash Silo Load Out

Identification: Truck load out from Unit 1 and Unit 2 Bottom Ash Silo is transported to the landfills via dump truck. It is shown in Appendix A as Item 10 and pictured in Figure 3-2. The dust control measures are described in Table 3-3. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-10: U1/U2 Bottom Ash Loading Operation**



**Table 3-11: U1/U2 Bottom Ash Silo Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Controlling the flow rate	A smooth, homogenous flow of materials reduces surface disturbances and reduces the amount of dust generated.
Using telescopic chutes	In the event the mixers are not functioning to condition the ash, during dry load out, a telescopic chute shall be used to reduce the distance that the material travels while exposed to open air which will aid to minimize dust created by the drop into the truck.

### 3.11 New U1/U2 Fly Ash Silo Load Out

Identification: Truck load out from the new Unit 1 and Unit 2 Fly Ash Silo is transported to the landfill via dump truck. It is shown in Appendix A as Item 11 and pictured in Figure 3-2. The dust control measures are described in Table 3-3. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator's discretion.

**Figure 3-11: New U1/U2 Fly Ash Silo Loading Operation**



**Table 3-12: New U1/U2 Fly Ash Silo Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.
Controlling the flow rate	A smooth, homogenous flow of materials reduces surface disturbances and reduces the amount of dust generated.

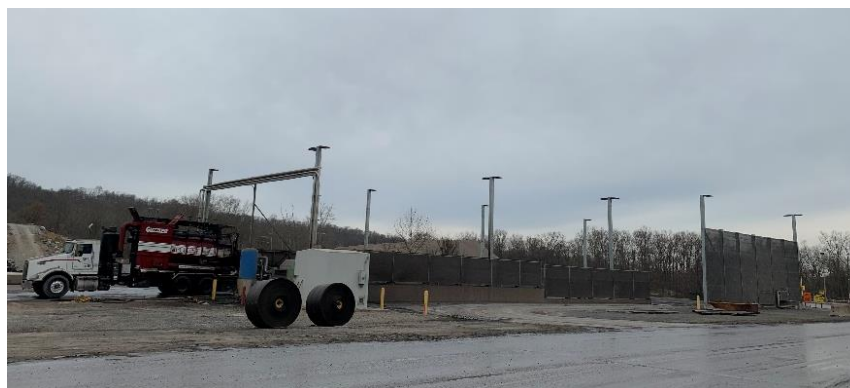
### 3.12 Vacuum Truck Ash Handling Station & Load Out

Identification: Truck load out from Vacuum Truck Ash Handling Station is transported to the landfills via dump truck. It is shown in Appendix A as Item 12 and pictured in Figure 3-2. The dust control measures are described in Table 3-3. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-12: Vacuum Truck Ash Handling Station Loading Operation**



**Table 3-13: Vacuum Truck Ash Handling Station Load Out Control Measures**

Description of Control Measures	Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions
Wind Fence & Foggers	Wind fencing and fogging system has been installed to control fugitive dust when unloading and loading material at the handling station.
Truck Tire Wash	Tire wash has been installed for vehicle traffic to use to minimize carryover and dust during the haul to the landfill from the handling station.

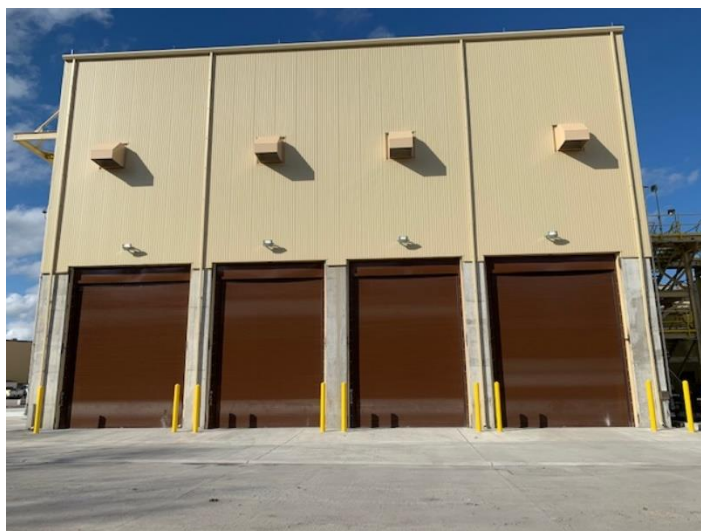
### 3.13 Filter Press and Filter Press Truck Load Out

Identification: Truck load out from the waste water treatment plant’s filter presses is transported to the landfills via dump truck. It is shown in Appendix A as Item 13 and pictured in Figure 3-2. The dust control measures are described in Table 3-3. Maintenance records are in kept in the CMMS.

As a best management practice, visual observations are made daily and recorded monthly in a log book. Visual observations should be made by a qualified individual or under the direction of a qualified individual who understands EPA Method 22 or EPA Method 9.

As a result of visual observation, additional control measures deemed necessary to minimize fugitive dust may be implemented at the Owner/Operator’s discretion.

**Figure 3-13: Filter Press Truck Load Out**





**Table 3-14: Filter Press Truck Load Out Control Measures**

<b>Description of Control Measures</b>	<b>Explanation of How the Measures Selected are Applicable and Appropriate for Site Conditions</b>
Bay doors	Loading bay doors will be in the closed position for normal operation during filter press discharge to minimize any fugitive dust.
Adding water as needed	The application of water suppresses dust formation during the drop into the truck. Wetting CCR with water is acceptable as it serves to condition the CCR material to a moisture content that will prevent wind dispersal. Wetting CCR is allowed if there are insignificant or de minimis amounts of CCR within those free liquids or if it moistens the CCR and does not result in free liquids.

## **4.0 PROCEDURES FOR LOGGING CITIZEN COMPLAINTS**

A requirement to the CCR fugitive dust control plan per the CCR Rule (see Section 257.80(b)(3)) indicates that owners and operators of all CCR units will implement formal procedures to log citizen complaints involving CCR fugitive dust events. These complaints must then be included as part of the annual CCR fugitive dust control report. The annual report must be placed in the CCR Operating Record and on the owner's CCR public website.

EKPC has established a web form on the CCR Rule Compliance Data and Information website to log citizen complaints. This web form will be used by the public to submit their complaints related to fugitive dust. Complaints received via another method (such as phone, mail, or email) will be entered into the web form and officially submitted by the EKPC personnel who received the complaint. After receiving the citizen complaint, EKPC personnel will manually log the complaint on a Microsoft Excel worksheet that will be used to track all complaints and all resolutions to those complaints. This Excel worksheet will be included in the annual CCR fugitive dust control report to meet the requirements of the CCR Rule. A screenshot of the citizen complaint web form and the citizen complaint log can be found in Appendix B.

## 5.0 PERIODIC ASSESSMENT AND ANNUAL REPORT

EKPC may amend the written CCR fugitive dust control plan at any time. However, EKPC must amend the written plan whenever there is a change in conditions that would substantially affect the written plan, such as, but not limited to, the construction and operation of a new CCR unit. The plan and any subsequent amendments must be certified by a qualified professional engineer. The first annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's Operating Record. Subsequent annual reports are to be placed in the Operating Record 12 months following the previous annual report. The initial CCR fugitive dust control plan must be placed in the facility's Operating Record no later than October 19, 2015.

Upon modification of the CCR Fugitive Dust Plan, the following steps must be taken:

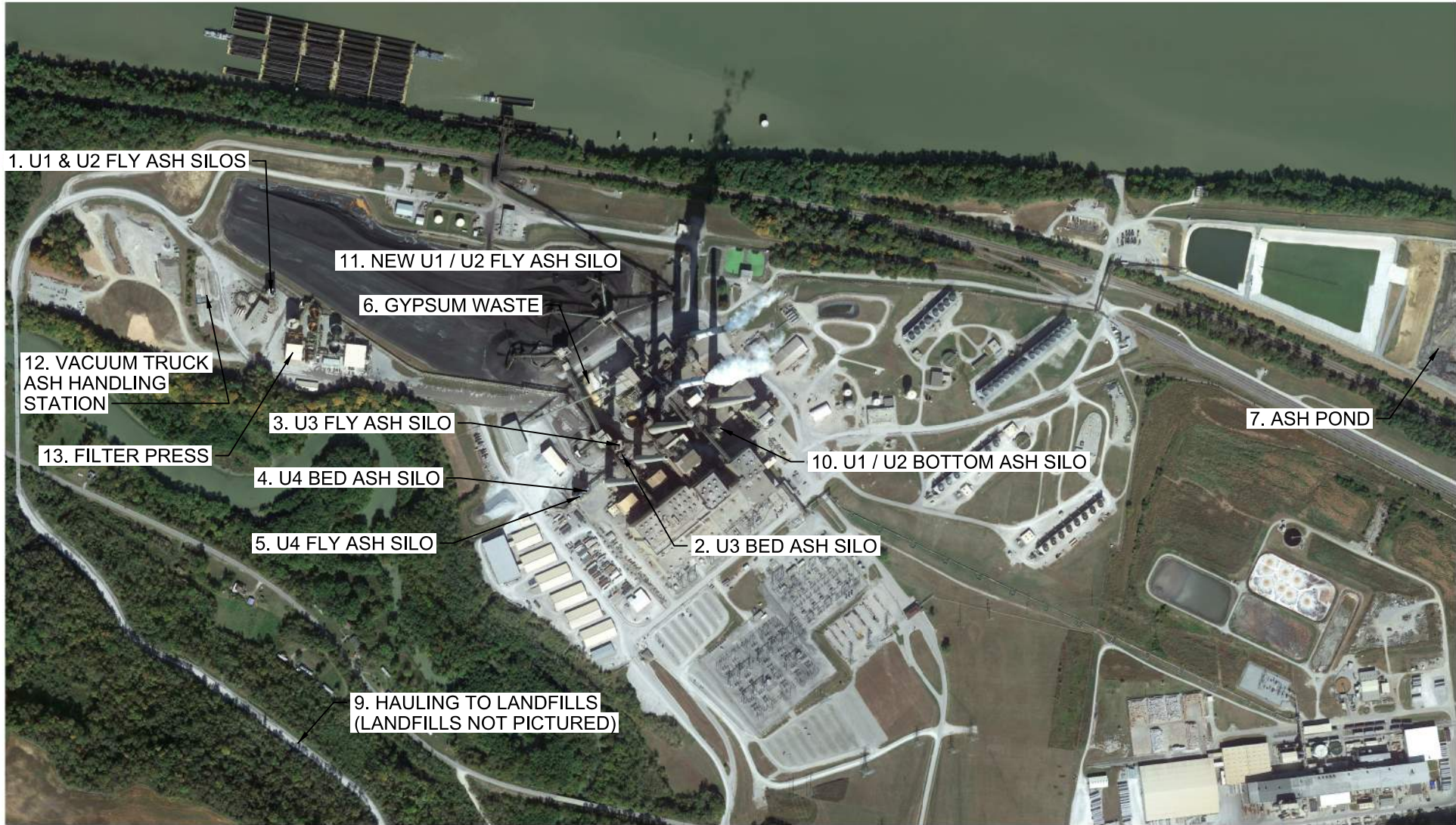
- Certify plan by qualified professional engineer
- Place the updated CCR Fugitive Dust Plan in the Operating Record
- Notify affected plant personnel of new procedures
- Publish the updated CCR Fugitive Dust Plan to the CCR website within 30 days of placing in the Operating Record

EKPC is required to prepare an annual CCR fugitive dust control report that includes:

- A description of the actions 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.



**APPENDIX A - SITE MAP OF FUGITIVE DUST SOURCES INCLUDED IN PLAN**



**EAST KENTUCKY  
POWER COOPERATIVE  
SPURLOCK PLANT**



**EAST KENTUCKY  
POWER COOPERATIVE  
SPURLOCK LANDFILL**

**APPENDIX B - FUGITIVE DUST CITIZEN COMPLAINT DOCUMENTS**



## EKPC CCR Fugitive Dust Citizen Complaint Form

### Your Contact Information

If you do not provide your name or other information, it may be impossible for us to refer, respond to, or investigate your complaint.

First/Given Name

Last/Family Name:

Street Address:

City/Town:

Zip/Post Code:

Email Address:

Your email address is required if you would like us to send you a reference number for your complaint. The reference number will make it possible for you to access your complaint letter.

Phone Number:

### Your Complaint

Power Station  ▼

Date:

Time:

Hour:  ▼ Minutes:  ▼ AM/PM  ▼

Location:

Weather Conditions:

What is your complaint?

Submit





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