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**CCR FUGITIVE DUST CONTROL PLAN - ASH BASIN NO. 1**

CCR-MTR-ASH  
BASIN 1  
Revision: 0  
Issued Date:  
09/30/2015

Document Owner: Montour SES, LLC

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Approved by: John R. Weeks, Jr. - Plant Mgr - Fossil Generation

Check this box if changes or feedback is required.

This document has been issued and revised as indicated below. If this is a later revision than what is now in your possession, please destroy the previous issue, or clearly mark it as "UPDATED".

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**Summary of Alterations**

Issue Date & Rev. #	Description of Change
09/30/2015 – Rev. 0	Initial issuance of CCR Fugitive Dust Control Plan

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**1.0 PURPOSE AND SCOPE**

**1.1 Purpose**

1.1.1 The purpose of this plan comply with the Air Criteria requirements specified in 40 CFR Part §257.80(b), pertaining to the preparation and implementation of a Fugitive Dust Control Plan.

**1.2 Scope**

N/A

**2.0 REFERENCES AND COMMITMENTS**

**2.1 Developmental References**

40 CFR Part §257

**2.2 Performance References**

**2.2.1 Regulatory Requirements**

Regulation (Federal/State)	Citation
CCR Rule	40 CFR Part §257.80
Air Quality (CAA)	40 CFR Parts §§50-61
Title V Operating Permit #47-00001	25 PA Code §127.511
Prohibition of Fugitive Emissions	25 PA Code §§123.1 & 123.2

**2.3 Commitments**

40 CFR Part §257

**3.0 DEFINITIONS**

3.1.1 Area of Interest – This pertains to a CCR landfill and any lateral expansion of a CCR landfill. The site specific Areas of Interest are specifically identified in Attachment B of this procedure.

3.1.2 CCR – Coal Combustion Residuals, include fly ash, bottom ash, boiler slag, and fule gas desulfurization materials such as synthetic gypsum.

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- 3.1.3 CCR Fugitive Dust – Means solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney.
- 3.1.4 Fugitive Air Contaminant – An air contaminant of the outdoor atmosphere not emitted through a flue, including, but not limited to, industrial process losses, stock pile losses, reentrained dust and construction/demolition activities.
- 3.1.5 Fugitive Emissions – For purposes of Chapter 127 (relating to construction, modification, reactivation and operation of sources), those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening.
- 3.1.6 Qualified Inspector – As per 40 CFR Part §257.83(a), persons performing inspections must be “qualified”. A qualified inspector is a person who has been deemed qualified as per internal employee training and instruction.

**4.0 RESPONSIBILITIES**

Qualified Inspector(s) shall verify the plant operations are within compliance of this procedure.

**5.0 INSTRUCTIONS**

**5.1 Weekly Fugitive Dust Inspections**

5.1.1 Qualified Inspector(s) will perform, at a minimum, weekly perimeter inspections and “areas of interest” associated with Ash Basin 1 and will utilize the Ash Basin 1 Weekly Fugitive Dust Inspection Log Sheet – See Attachment A.

5.1.2 In addition to the perimeter observations along the crest of the basin, the inspection will focus on the following fugitive emissions sources associated with Ash Basin 1:

1. Non-vegetated exposed ash deltas in Cell B – Referenced as Area #1 on the Attachment B – Ash Basin 1 Weekly Monitoring Program Survey Map;
2. Bottom ash processing area (storage and loading of conditioned bottom ash), located in Cell B – Referenced as Area #2 on the Attachment B – Ash Basin 1 Weekly Monitoring Program Survey Map;
3. Bottom ash fines soil blending operations (storage and loading of blended material), located in Cell A – Referenced as Area #3 on the Attachment B – Ash Basin 1 Weekly Monitoring Program Survey Map; and
4. Conditioned flyash placement located in Cell A
5. Any vehicular traffic on or around the perimeter of Ash Basin 1.

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5.1.3 Controls of any observed dust from this area might include:

1. Mobilize hydro seeder (water tanker truck) to wet down area
2. Apply dust suppressant to exposed surface
3. Conditioned flyash is to be uniformly spread and compacted in layers not exceeding two feet in thickness.
4. Exposed rolled surfaces of conditioned flyash shall be sprayed with water at the end of each day to seal surfaces overnight.
5. Place 12 inches of intermediate topsoil over conditioned flyash surfaces at finished grade.
6. The intermediate cover on the conditioned flyash is to be hydroseeded per the permit.

5.1.4 The Qualified Inspector will complete the Ash Basin 1 Weekly Fugitive Dust Inspection Log Sheet – Attachment A as follows:

1. Month and Year – The person completing inspection will fill-in the date the inspection was performed to include the month, day and year in the following format – mm/dd/yyyy.
  - a. Example: 04/17/2015
2. Name – Complete first and last name of the person performing the fugitive dust observation inspection.
  - a. Example: John Doe
3. Start and End Time – Complete the time that the inspection began and the time that the inspection concluded utilizing 24-hour time.
  - a. Example: Start – 0700, End – 0830
4. Wind Speed and Direction – The approximate wind speed in mph and direction the wind is moving towards.
  - a. Example: Speed – 5 mph, Direction – South East

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5.1.4 (continued)

- 5. Fugitive Dust Emissions – YES or NO.
  - a. YES means that fugitive dust emissions were detected from a source and NO means that none were detected.
    - (1) If YES, the comments portion should be completed to identify the source of fugitive dust emissions and corrective action measures that were taken to mitigate the source of the fugitive dust emissions.
- 6. Comments/Corrective Actions – Describe any YES entries made on the log and what actions were taken as a result of the observations towards mitigating the issue. Use additional pages if necessary. .
  - a. Example: YES, Comments – Fugitive dust emissions were observed from the area #3 ash fines soil blending area storage piles. The ash area coordinator was notified and the water tanker truck was mobilized to wet down the area. This area will continue to be wetted down until the storage pile size is reduced.

5.1.5 The Qualified Inspector performing the inspection must inform the plant Environmental Professional, Ops Manager, Maintenance and Engineering Manager, or Plant Manager if any YES entries are made on the inspection log sheet. This is necessary since some types of deviations may require reporting to the regulatory agency in a specified period of time after observing the deviation.

5.1.6 The plant management should then in-turn determine if notification is required and also inform the Corporate Environmental Compliance Group so that the deviation is documented on the Annual CCR Fugitive Dust Control report.

5.1.7 The plant management will verify that the weekly inspection forms have been completed for the preceding week’s observations.

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**5.2 Citizen Complaints**

5.2.1 As required under 40 CFR Part §257.80(b)(3), this fugitive dust control plan must include a procedure to log citizen complaints received by the owner or operator involving fugitive dust events associated with the CCR units located at the facility. The following procedure will be implemented in the event that a citizen complaint is received associated with fugitive dust emissions generated from Ash Basin 1.

1. Attachment C of this document will be used to log the citizen complaint. The person completing the Fugitive Dusting Citizen Complaint Log will record the following information on the log form:
  - a. Date and Time the complaint was received;
  - b. Name of the Facility Representative taking the call and completing the log form;
  - c. The full name of the complainant (first and last). If the complainant does not want to provide their name, the word "Anonymous" should be used;
  - d. Complainant Address and Phone Number – write "Refused to Provide" if they do not provide this information at the time of the call; and
  - e. Nature of the Complaint – Record all details associated with the complaint, such as"
    - Source of dust emissions
    - Wind-speed and Direction
    - Was there any property damage associated with the dust emissions?
    - Where were emissions observed off the property?
    - Where was the complainant located at the time of the call?
    - Did a facility representative confirm the alleged dust emissions?
    - Any other details associated with the call

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5.2.1 (continued)

2. Within 1 hour after receiving a citizen dust complaint, a facility representative must complete a fugitive dust observation/inspection of the source area in question. The Attachment A – Weekly Fugitive Dust Inspection Log Sheet must be completed to document the follow-up observations.
  - a. It should be noted in the Comments section that the inspection was being performed as a follow-up to a citizen’s complaint.
3. The facility representative completing the Attachment C – Fugitive Dusting Citizen Complaint Log must inform the plant management as soon as possible, but not more than 12 hours from the time the complaint call was received. The plant management must be provided with the details of the complaint. This is necessary since the complaint could potentially result in a reportable incident to the regulatory agency.
4. The plant management will in-turn contact the Talen Energy corporate communications department at: 1-888-211-6011 within 12 hours after their receipt of the citizen complaint and provide them with the details of the complaint.

5.2.2 The Attachment C – Fugitive Dusting Citizen Complaint Log sheet must be maintained on-site with the working copy of the fugitive dust control plan until officially uploaded.

5.2.3 The record of all citizen complaints received in the 12-month period following submittal of the Annual CCR Fugitive Dust Control Report will be included in the report.



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**6.0 REPORTING, NOTIFICATION AND RECORD KEEPING**

**6.1 Reporting Requirements**

6.1.1 As required under 40 CFR Part §257.80(c), an Annual CCR Fugitive Dust Report must be completed.

1. The initial report is due no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record.
2. The deadline for subsequent plan completion is 12 months after completion of the previous.
3. The report is considered to be complete after it becomes part of the facility's operating record (i.e. posting to the publicly available web-site).

6.1.2 The annual report is required to contain the following items:

1. All actions taken by facility to control fugitive dust generation from Ash Basin 1.
  - a. A copy of the Attachment A – Weekly Fugitive Dust Inspection Logs will be included to satisfy this item;
2. A record of all citizen complaints.
  - a. A copy of the Attachment C – Fugitive Dusting Citizen Complaint Logs will be included to satisfy this item; and
3. A summary of any corrective measures taken to mitigate fugitive dust generation.
  - a. A copy of the Attachment A – Weekly Fugitive Dust Inspection Logs will be included to satisfy this item.

6.1.3 The initial and Annual Reports will be prepared and posted by the designated person.

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**6.2 Plan Review and Amendment**

- 6.2.1 40 CFR Part §257.80(b)(6) requires the CCR Fugitive Dust Control plan be amended any time there is a change in conditions that would substantially affect the written plan in effect, such as the initiation of a new activity within the Ash Basin 1 area that has the potential to generate fugitive dust emissions.
- 6.2.2 40 CFR Part §257.80(b)(6) requires that revised or amended plans be posted to the facility's operating record. Facility personnel will coordinate with appropriate corporate personnel for the posting of revised/amended plans to the facility's operating record/publicly available web-site.
- 6.2.3 Any revised or amended plans require re-certification by a qualified professional engineer. Professional Engineer certifications are contained in Attachment E of the plan.

**6.3 Records**

- 6.3.1 Consistent with the requirements of 40 CFR Part §257.105(b), records associated with the implementation of this fugitive dust control plan must be retained for a period of 5 years. In addition, the plan must also become part of the facility's Operating Record. The facility's Operating Record posting requirements are also consistent with the public records web-site posting requirements of §257.107(g). These include the following dust control records/documents:
  - 1. The posting of this plan and subsequent plan amendments; and
  - 2. The annual CCR fugitive dust control report required by §257.80(c), which includes:
    - a. A description of the actions taken by the owner or operator to control CCR fugitive dust; and
    - b. A record of all citizen complaints, and a summary of any corrective measures taken.

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**ATTACHMENT A, ASH BASIN 1 WEEKLY FUGITIVE DUST INSPECTION LOG**

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Attachment A Montour SES - Ash Basin No. 1 Fugitive Dust Inspection Log  
CCR Rule Fugitive Dust Control Plan

DATE (mm/dd/yyyy)	Name of Person Performing Inspection (First Name / Last Name)	Start Time (ex. 0700)	End Time (ex. 0830)	Wind Speed & Direction (ex. 5 mph / SE)	Fugitive Emissions (YES / NO)	Comments/Corrective Actions (if required)	Was Plant Env Professional Notified (YES / NO)

**NOTE:** The Ash Basin No. 1 fugitive dust emissions inspection should include those areas identified in the Ash Basin No. 1 fugitive dust control plan and indicated on the Ash Basin No. 1 Weekly monitoring Program Survey Map. Any "YES" entry in the "Fugitive Emissions" column must include some level of follow-up corrective action measure taken to mitigate the source of the dust emissions. A description of the corrective action measures should be noted in the "Comments / Corrective Actions" column of the form. Any item with a "YES" entry in the "Fugitive Emissions" column must also be reported to the plant environmental professional to determine if agency notification/reporting requirements apply.

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**ATTACHMENT B, ASH BASIN 1 WEEKLY MONITORING PROGRAM SURVEY MAP**

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**ATTACHMENT C, ASH BASIN 1 FUGITIVE DUSTING CITIZEN COMPLAINT LOG**

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Attachment C - Montour SES - Ash Basin No. 1 Fugitive Dust Complaint Log  
CCR Rule Fugitive Dust Control Plan

List the Date & Time Complaint Received	Name of Montour Representative Taking Call	List the Complainant's Name	List the Complainant's Address	List the Complainant's Phone Number	List the Nature of Complaint (Details Associated with Complaint)

**NOTE:** Record all details associated with the complaint, such as: source of dust emissions, wind-speed and direction, was there any property damage associated with the dust emissions, where emissions observed off the property, where was the complainant located at the time of the call, did a Montour employee confirm the alleged dust emissions??? Any other details associated with the call.

**IMPORTANT:** Within 1-hour after receiving a citizen complaint, a person must complete a Fugitive Dust Inspection of the alleged source area and complete the Attachment A - Fugitive Dust Inspection Log Sheet.

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**ATTACHMENT D, ASH BASIN 1 RECORD OF PLAN REVIEW LOG**

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Attachment D - Montour SES - Ash Basin No. 1 - Record of Plan Review  
CCR Rule Fugitive Dust Control Plan

Date of Plan Review	Name of Person Performing Review	Reason for Review (Annual or Other)	Did Review Lead to a Plan Revision (YES/NO)	Comments (See 'Note)

**NOTE:** Specify reason for plan review and detail any changes that may have been made in the plan revisions, such as Section numbers, etc. Note: any review that leads to a plan amendment / revision requires that the plan be re-certified by a Professional Engineer. The revised plan must be posted to the facility operating record and posted to the public web-site. Only the most recent plan should be available on the public web-site. A plan review is required, at a minimum, on an annual calendar year basis.

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**ATTACHMENT E, PROFESSIONAL ENGINEER CERTIFICATION**

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Benjamin Robert Wilburn  
Name of Qualified Professional Engineer

PE080739  
Professional Engineer No.

Benjamin R Wilburn 9/30/2015  
Date Signed & Sealed