

# **FUGITIVE DUST CONTROL PLAN**

Prepared For  
KINGFISHER DEVELOPMENT, LLC  
KILLEN FACILITY  
14869 US ROUTE 52  
MANCHESTER, OH 45144

Prepared By:

ATON, LLC  
Fenton, Missouri

March 6, 2020

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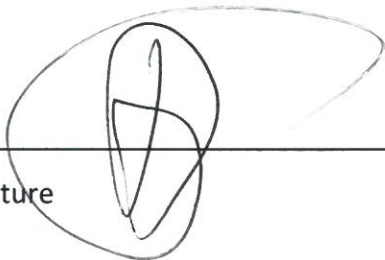
## APPENDICES

APPENDIX A	CCR CITIZEN COMPLAINT LOG
APPENDIX B	PLAN AMENDMENTS

**PROFESSIONAL ENGINEER CERTIFICATION**

I certify that I have personally reviewed the CCR Fugitive Dust Control Plan for Kingfisher Development, Killen Facility dated March 6, 2020, and according to my knowledge, information, and belief, the plan is complete and meets the requirements of 40 CFR §257.80(b).

Adam Peetz  
Printed Name of Registered Professional Engineer

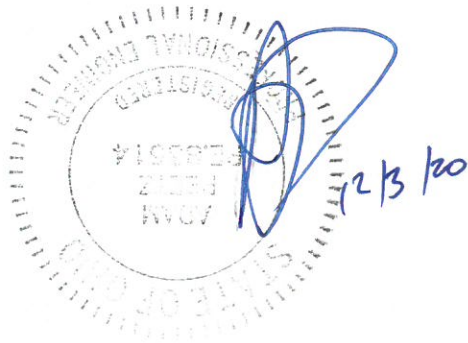
  
Signature

PE 83914  
Registration No.

OH  
Registration State

12/3/20  
Date

Place Seal Below:



## **1. INTRODUCTION**

Kingfisher Development's Killen facility (Killen) is located in a rural area between US Route 52 and the Ohio River in Adams County, Ohio. This former coal-fired power plant started operations in 1981 and permanently closed in May 2018. Coal ash and gypsum are the coal combustion residuals (CCR) managed at the site. The property has one pond that is divided into a section for bottom ash and section for fly ash, and Collection Basins 1 and 2 used for flue gas desulfurization (FGD) wastewater that contains residual gypsum and other wastewaters.

When the site was operating, fly ash was mixed with water and wet sluiced to the fly ash section of the pond. The bottom ash was also wet sluiced to the pond. The wastewater from the pond discharges into the Ohio River.

Coal pyrites (rock material in the coal supply) and ash from the boiler economizer was also sluiced to the bottom ash pond.

Gypsum was created in the FGD system. Gypsum remaining on site will be moved to Landfill 9 at the Stuart site.

The fugitive dust control measures that are being used were primarily selected in accordance with the measures contained in the Killen Title V air permit.

## **2. ON-SITE ROADWAYS AND PARKING AREAS**

The site shall employ the most appropriate control measures on roadways and parking areas that are sufficient to minimize visible particulates of fugitive dust<sup>1</sup>. On-site roadways are roadways within the fence line of the Killen property located south of US 52, including roads for truck movement and materials hauling around the impoundments.

### a. Control Measures

The Killen Title V Permit includes measures for the control of fugitive dust from roadways and parking lots generated during operations. These same control measures, included below, are also applicable and appropriate to minimize dust generated during transportation of coal combustion residuals.

Appropriate control measures for paved roads and parking areas include the following best management practices: the use of reduced speed limits, sweeping, watering, chemical stabilization, and good housekeeping. The appropriate control measures shall be administered at sufficient frequencies to minimize visible fugitive dust as determined by the site's inspections.

Unpaved roads will be treated using water and the use of chemical stabilization if necessary. The needed frequencies for implementation of the control measures shall be determined by the site's inspections.

If water spray is used to control dust, application rates should be optimized to an amount adequate for controlling the fugitive dust, but not in excessive amounts. A water truck with a spray bar is recommended.

If materials that could generate fugitive dust are inadvertently deposited onto roadways and/or parking areas from earth moving equipment, erosion, or other means, Killen shall promptly remove such materials.

During transportation, trucks hauling materials that are likely to become airborne shall be wetted or such materials will be covered.

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<sup>1</sup> Reference Ohio EPA Title V Permit, P0115061 issued 10/17/2013.

b. Monitoring and Recordkeeping Requirements

Except as noted below, Killen will inspect each roadway section (paved and unpaved), and parking areas daily during normal operations to determine if control measures are needed. Inspections are not required for a roadway or parking area that is covered in snow and/or ice, or if precipitation is sufficient to prevent visible fugitive dust.

Killen will maintain inspection records that include the following:

- the date and reason any required inspection was not performed, including those that were not performed due to snow and/or ice cover or precipitation,
- the date of each inspection where it was determined that a control measure was necessary,
- the dates that control measures were implemented, and
- on a calendar quarter basis, the number of days a control measure was implemented and the total number of days where snow and/or ice cover or precipitation was the reason an inspection was not conducted.

### **3. ASH IMPOUNDMENT FUGITIVE DUST CONTROL MEASURES**

a. Control Measures

There is potential for fugitive dust when the pond water level is lowered, and ash is exposed to wind erosion; and winter freezing results in desiccation of any exposed ash and wind generated fugitive dust. There are few options to control fugitive dust from exposed ash in the pond due to the large surface area of the pond and the limited ability to apply water sprays or chemical suppressants from the roads and other areas surrounding the ponds. When practicable, exposed ash will be wetted, or treated chemically during periods of low pond water level. Additional control measures may be considered if warranted as evidenced by the site's inspections.

The implementation of additional control measures for wind erosion shall be determined by the site's inspections.

b. Monitoring and recordkeeping requirements

For wind erosion, Killen will conduct weekly inspections of the ash impoundments to determine if additional control measures are needed. Inspections are not required if the areas are covered in snow and/or ice, or if precipitation is sufficient to prevent visible fugitive dust.

Killen will maintain inspection records for each impoundment that include the following:

- the date and reason any required inspection was not performed, including those that were not performed due to snow and/or ice cover or precipitation,
- the date of each inspection where it was determined that a control measure was necessary,
- the dates that control measures were implemented, and
- on a calendar quarter basis, the number of days a control measure was implemented and the total number of days where snow and/or ice cover or precipitation was the reason an inspection was not conducted.

#### **4. GYPSUM MATERIAL HANDLING AND STORAGE PILES**

The FGD system at Killen produced gypsum. The only remaining gypsum is to be placed in Landfill #9 at the Stuart site. The gypsum will be loaded into trucks and hauled to the landfill.

a. Control Measures

The Killen Title V permit includes precautionary measures to address fugitive dusts generated by the gypsum material handling system and storage piles. Those measures are applicable and appropriate to include in the Killen CCR Fugitive Dust Control Plan.

During load-out operations, reasonable efforts will be made to maintain sufficient material moisture to minimize dust.

To control wind erosion from storage piles, sufficient moisture content will be maintained, and the pile height will be controlled.

b. Monitoring and recordkeeping requirements

Killen will conduct weekly inspections of the gypsum storage piles to determine if control measures are needed. Inspections are not required for wind erosion or for any storage pile activity if the storage piles are covered in snow and/or ice, or if precipitation is sufficient to prevent visible fugitive dust. Inspections of load-out operations are not necessary if precipitation is sufficient to prevent visible fugitive dust. A required inspection that is not completed due to any of the above mentioned conditions shall be performed as soon as such events have ended.

Killen will maintain inspection records for the gypsum storage piles that include the following:

- the date and reason any required inspection was not performed, including those that were not performed due to snow and/or ice cover or precipitation,
- the date of each inspection where it was determined that a control measure was necessary,
- the dates that control measures were implemented, and
- on a calendar quarter basis, the number of days a control measure was implemented and the total number of days where snow and/or ice cover or precipitation was the reason an inspection was not conducted.

## **5. PROCEDURE TO LOG CITIZEN COMPLAINTS**

Most citizen complaints are expected to come directly to the property from the citizen. However, a government agency or the media may also make an inquiry to the site on behalf of, or as a follow up to, a citizen complaint. A complaint may also be made to another office. The following procedure outlines the actions to be taken and the individuals responsible.

1. Complaint received by Kingfisher personnel:
  - a. The name and contact information of the person or agency making the complaint is to be logged by the Environmental Manager, along with the date of the complaint, date of the incident that is the source of the complaint and the concern. The CCR Citizen Complaint Log, Appendix A, may be used for this purpose.
  - b. The complaint is to be forwarded to the Ohio Project Manager.



- c. The Ohio Project Manager, with the assistance of the Environmental Manager, will determine what response is to be taken, who will be responsible for completion of any action items, and who will respond to the citizen who made the complaint.
  - d. If appropriate, due to the severity or complexity of the complaint, the Ohio Project Manager, will contact CLP staff for guidance. Legal shall also be notified if the incident could result in media involvement.
  - e. The response to the incident shall be documented in a report along with the date of completion of any mitigation or corrective/preventative actions, and date that the response was communicated to the complainant. The Environmental Manager will maintain this documentation for a minimum of five years.
2. Complaint received by another office:
- a. The individual receiving the complaint is to forward the name and contact information of the person or agency making the complaint to the Environmental Manager. The Environmental Manager will maintain the complaint log including the date of the complaint, date of the incident that is the source of the complaint, and the concern. This information is to be documented on the complaint log along with the name of the individual who received the complaint.
  - b. Continue with 1.b., c., d., and e., above.

## **6. PERIODIC ASSESSMENTS OF THE CONTROL PLAN EFFECTIVENESS**

At least annually, the Environmental Manager will meet with the Ohio Project Manager to review the inspection records, citizen or agency complaints including any controls implemented in response to those complaints, and determine if additional control measures or inspections are necessary.

The discussion will also include any work or projects planned or anticipated in the upcoming year that could substantially increase fugitive dust emissions and/or the need to implement additional controls or inspections.

## **7. AMENDMENTS TO THE PLAN**

An amendment of this plan is required whenever there is a change in conditions that would substantially affect the written plan in effect, such as continued decommissioning and formal closure of the pond. Substantive amendments must be certified by a professional engineer who certifies that the amendment meets the requirements of §257.80(b). Amendments are recorded in Appendix B.

## **8. ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

Killen will prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the site to control CCR fugitive dust, a record of all citizen complaints and a summary of any corrective measures taken. Each report will be completed, as defined by §257.50(c) as being placed in the operating record, no later than one year after the date of completing the previous report.

## Appendix A CCR Citizen Complaint Log

## CCR Citizen Complaint Log

Date Received	Date of Incident	Name of Person Receiving Complaint	Name of Complainant	Description of Incident, including CCR Unit(s) Involved	Complainant Contact Information	Name of Responsible Person for Follow-up*

\* Document response in a separate report. Report to include the following: action items completed; other individuals or agency personnel outside of the company contacted; copy of response to complainant; date(s) response provided to complainant and any other communications to complainant; and any other pertinent information. If a root cause analysis completed, this report could meet this obligation.

## **Appendix B Plan Updates**

Fugitive Dust Control Plan  
Kingfisher Development, Killen Facility

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The Fugitive Dust Control Plan will be reviewed at least annually. Updates to the plan will be noted below. Substantial changes will require a new P.E. signature. The revised plan must be posted on the CCR website and in the site Operating Log.

Date	Updates	Implementation
March 2020	Revised AES plan to reflect change in ownership	Immediate
November 2020	Changed destination of gypsum to Stuart Landfill #9 from Killen Pond	After OEPA issues Killen Gypsum DFFO.