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**CCR RULE FUGITIVE DUST CONTROL PLAN - DISPOSAL  
AREA NO. 8**

CCR-BI-  
DISPOSAL  
AREA 8  
Revision: 0  
Issued Date:  
09/25/2015

Document Owner: Brunner Island, LLC

Reviewed by: Regulatory Compliance Professional -- Deborah L. Runkle

Approved by: Plant Manager - Fossil Generation -- Thomas Hickes

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
09/25/2015 – 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 is to outline the procedures that must be completed in order to 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. As per the Rule, the Fugitive Dust Control plan must address the items listed in §257.80(b)(1) through (b)(7) as follows:

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
  - Apply 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.

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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. 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.

1.2 **Scope**

N/A

2.0 **REFERENCES AND COMMITMENTS**

2.1 **Developmental References**

N/A

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 #67-05005	25 PA Code §127.511
Prohibition of Fugitive Emissions	25 PA Code §§123.1 & 123.2

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**2.3 Commitments**

N/A

**3.0 DEFINITIONS**

3.1.1 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.

3.1.2 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.

3.1.3 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.

3.1.4 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**

N/A

**5.0 INSTRUCTIONS**

**5.1 Weekly Fugitive Dust Inspections**

5.1.1 Qualified Inspectors will perform, at a minimum, weekly perimeter inspections and “areas of interest” associated with Disposal Area No. 8 and will utilize the Disposal Area 8 Weekly Fugitive Dust Inspection Log Sheet – See Attachment A, as a tool to perform and document that the inspection was performed. In addition to the perimeter observations along the crest of the basin, the inspection will focus on the following potential fugitive emissions sources associated with Disposal Area No. 8.

1. Non-vegetated exposed ash deltas in pond area that may potentially form when pond water level is lowered – Referenced as Area #3 on the Attachment B – Disposal Area 8 Weekly Monitoring Program Survey Map;

a. Controls of any observed dust from this area might include:

- Mobilize hydro seeder to wet down area
- Apply dust suppressant to exposed surface

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5.1.1 (continued)

2. Soil and Material stockpiles maintained in Area #1 on the Attachment B – Disposal Area 8 Weekly Monitoring Program Survey Map;
  - a. Controls of any observed dust from this area might include:
    - Mobilize water spray tanker to wet down area
    - Apply dust suppressant to exposed surface
  
3. Clean closure ash excavation activities – Referenced as Area #2 on the Attachment B – Disposal Area 8 Weekly Monitoring Program Survey Map; and
  - a. Controls of any observed dust from this area might include:
    - Mobilize water spray tanker to wet down area
    - Apply dust suppressant to exposed surface
    - Apply intermediate cover and vegetate exposed surface
  
4. Any vehicular traffic on or around the perimeter of Disposal Area 8.
  - a. Controls of any observed dust from this area might include:
    - Mobilize water spray tanker to wet down area
    - In addition, the truck tire wash noted in Area #1 on the Attachment B – Disposal Area 8 Weekly Monitoring Program Survey Map, will be operated for all truck traffic leaving the site.
    - 15 mph speed limit signs have been posted to limit the speed of all vehicular traffic traveling on the perimeter of the basin.

5.1.2 Personnel will complete the Disposal Area 8 Weekly Fugitive Dust Inspection Log Sheet – Attachment A as follows:

- 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. Example: 04/17/2015
- Name – Complete first and last name of the person performing the fugitive dust observation inspection. Example: John Doe

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- Start and End Time – Complete the time that the inspection began and the time that the inspection concluded utilizing 24-hour time. Example: Start 0700, End – 0830
- Wind Speed and Direction – The approximate wind speed in mph and direction the wind is moving towards. Example: Speed – 5 mph, Direction – South East
- Fugitive Dust Emissions – YES or NO. YES means that fugitive dust emissions were detected from a source and NO means that none were detected. 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. Example: YES, Comments – Fugitive dust emissions were observed from the Area #3 basin clean closure ash excavation area. The project coordinator was notified and the water tanker truck was mobilized the wet down the area. This area will continue to be wetted down until fugitive emissions are eliminated. No dust emissions were observed leaving the Disposal Area 8 boundary. This observation was reported to the environmental professional.
- Comments/Corrective Actions – Describe any YES entries made on the log and what actions were taken as a result of the observation towards mitigating the issue. Use additional pages if necessary.

5.1.3 The person performing the inspection must inform the plant Environmental Professional 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.

5.1.4 The plant Environmental Professional should in-turn determine if notification is required and also inform Supply Support Services – Environmental Compliance Group so that the deviation is documented on the Annual CCR Fugitive Dust Control report.

5.1.5 The plant Environmental Professional will verify that the weekly inspection forms have been completed no later than Wednesday after the start on the week for the preceding week's observations.

**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 Disposal Area 8.

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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?
    - 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
  
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 – Disposal Area 8 Weekly Fugitive Dust Inspection Log Sheet must be completed to document the follow-up observations. 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 – Disposal Area 8 Fugitive Dusting Citizen Complaint Log must inform the plant Environmental Professional as soon as possible, but not more than 12 hours from the time the complaint call was received. The plant Environmental Professional 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.



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4. The plant Environmental Professional 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 – Disposal Area 8 Fugitive Dust Citizen Complaint Log sheet must be maintained on-site with the working copy of the fugitive dust control plan.

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

**5.3 Reporting and Notification Requirements**

5.3.1 As required under 40 CFR Part §257.80(c), an Annual CCR Fugitive Dust report must be completed. 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 (Approximately November 1, 2016). The deadline for subsequent plan completion is 12 months after completion of the previous. The report is considered to be complete after it becomes part of the facility’s operating record (i.e. posted to the publicly available web-site). The annual report is required to contain the following items:

1. All actions taken by facility to control fugitive dust generation from Disposal Area 8. A copy of the Attachment A – Disposal Area 8 Weekly Fugitive Dust Inspection Logs will be used/included to satisfy this item;
2. A record of all citizen complaints. A copy of the Attachment C – Disposal Area 8 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 copy of the Attachment A – Disposal Area 8 Weekly Fugitive Dust Inspection Logs will be used/included to satisfy this item.

5.3.2 The initial and subsequent Annual Reports will be prepared and posted by the designated person from Supply Support Services or the facility.

5.3.3 As required under 40 CFR Part §257-106(g), after posting the initial and subsequent Annual CCR Fugitive Dust report to the facility operating record, notification of the posting must be made to the PADEP Regional Waste Director.

**5.4 Plan Review and Amendment**

5.4.1 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 Disposal Area 8 area that has the potential to generate fugitive dust emissions.

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- 5.4.2 While there is no specific plan review frequency, the plan will be reviewed by facility representatives at a minimum of annually on a calendar year basis. A record of the plan review will be documented in the Attachment D – Disposal Area 8 Record of Plan Review Log.
- 5.4.3 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 Supply Support Services for the posting of revised/amended plans to the facility’s operating record/publicly available web-site.
- 5.4.4 Any revised or amended plans require recertification by a qualified professional engineer. Professional Engineer certifications are contained in Attachment E – Professional Engineer Certification.

**6.0 RECORDS**

6.1.1 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 plant 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.
  - The public web-site can be found at the following web address:  
<https://www.talenenergy.com/>

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**ATTACHMENT A, DISPOSAL AREA 8 WEEKLY FUGITIVE DUST INSPECTION LOG**  
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Attachment A Brunner Island, LLC - Disposal Area 8 Weekly 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 Disposal Area 8 fugitive dust emissions inspection should include those areas identified in the Disposal Area 8 fugitive dust control plan and indicated on the Disposal Area 8 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, DISPOSAL AREA 8 WEEKLY MONITORING PROGRAM SURVEY MAP**  
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**ATTACHMENT C, DISPOSAL AREA 8 CITIZEN COMPLAINT LOG**  
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Attachment C - Brunner Island, LLC - Disposal Area 8 Fugitive Dusting Citizen Complaint Log  
CCR Rule Fugitive Dust Control Plan

List the Date & Time Complaint Received	Name of Brunner Island 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 emisisions, where emissions observed off the property, where was the complainant located at the time of the call, did a Brunner Island 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, DISPOSAL AREA 8 RECORD OF PLAN REVIEW LOG**  
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**Attachment D - Brunner Island, LLC - Disposal Area 8 - 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

PE 080739

Professional Engineer No.

Benjamin Wilburn 9/25/2015

Date Signed & Sealed