

Level of Use: Information Use	CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3	CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015
----------------------------------	--	--

Document Owner: Montour SES, LLC

Reviewed by: Principal Engineer -- John L. McCabe III

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

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".

Level of Use: Information Use	CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3	CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015
----------------------------------	--	--

Table of Contents

Subsection	Title	Page
1.0	PURPOSE AND SCOPE	3
2.0	REFERENCES AND COMMITMENTS	3
3.0	DEFINITIONS	3
4.0	RESPONSIBILITIES	4
5.0	INSTRUCTIONS	4
5.1	Weekly Fugitive Dust Inspections	4
5.2	Citizen Complaints	7
6.0	REPORTING, NOTIFICATION AND RECORD KEEPING	9
6.1	Reporting and Notification Requirements	9
6.2	Plan Review and Amendment.....	10
6.3	Records	10
	ATTACHMENT A, ASH STORAGE AREA 3 WEEKLY FUGITIVE DUST INSPECTION LOG	11
	ATTACHMENT B, ASH STORAGE AREA 3 WEEKLY MONITORING PROGRAM SURVEY MAP	12
	ATTACHMENT C, ASH STORAGE AREA 3 FUGITIVE DUSTING CITIZEN COMPLAINT LOG	13
	ATTACHMENT D, ASH STORAGE AREA 3 RECORD OF PLAN REVIEW	14
	ATTACHMENT E, PROFESSIONAL ENGINEER CERTIFICATION.....	15

Summary of Alterations

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

Level of Use: Information Use	CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3	CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015
----------------------------------	--	--

1.0 PURPOSE AND SCOPE

1.1 Purpose

1.1.1 The purpose of this plan is to comply with the Air Criteria requirements specified in 40 CRF 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.

<p>Level of Use: Information Use</p>	<p>CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3</p>	<p>CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015</p>
--	---	---

- 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 Inspectors will perform, at a minimum, weekly perimeter inspections and “areas of interest” associated with Ash Storage Area 3 and will utilize the Weekly Fugitive Dust Inspection Log Sheet – See Attachment A.

- 1. Gypsum Conveyor Drop Point, Storage Pile and Loading Operations – Referenced as Area #1 on the Attachment B – Weekly Monitoring Program Survey Map;
- 2. Landfill Operations – Referenced as Area #2 on the Attachment B – Weekly Monitoring Program Survey Map;
- 3. Any vehicular traffic on or around the perimeter of Ash Storage Area 3.

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

- 1. Mobilize hydro seeder tanker to wet down area
- 2. Apply dust suppressant to exposed surface

<p>Level of Use: Information Use</p>	<p>CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3</p>	<p>CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015</p>
--	---	---

5.1.3 The Qualified Inspector will complete the 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
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 #1 gypsum 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. No dust emissions were observed leaving the Ash Storage Area 3 boundary. This observation was reported to the environmental professional.

<p>Level of Use: Information Use</p>	<p>CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3</p>	<p>CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015</p>
--	---	---

- 5.1.4 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.
- 5.1.5 The plant management should 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.
- 5.1.6 The plant management will verify that the weekly inspection forms have been completed for the preceding week's observations.

<p>Level of Use: Information Use</p>	<p>CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3</p>	<p>CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015</p>
--	---	---

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 Storage Area 3:

1. Attachment C of this document will be used to log the citizen complaint. The person completing the Fugitive Dust 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

<p>Level of Use: Information Use</p>	<p>CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3</p>	<p>CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015</p>
--	---	---

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 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.
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.

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.

Level of Use: Information Use	CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3	CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015
----------------------------------	--	--

6.0 REPORTING, NOTIFICATION AND RECORD KEEPING

6.1 Reporting and Notification 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. posted 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 Storage Area 3.
 - 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 3 – 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

<p>Level of Use: Information Use</p>	<p>CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3</p>	<p>CCR-MON Ash Storage Area 3 Revision: 0 Issued Date: 09/30/2015</p>
--	---	---

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 Storage Area 3 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 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.

Level of Use:
Information Use

CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE AREA NO. 3

CCR-MON Ash Storage Area 3
Revision: 0
Issued Date:
09/30/2015

ATTACHMENT A, ASH STORAGE AREA 3 WEEKLY FUGITIVE DUST INSPECTION LOG

Page 1 of 1

Attachment A Montour SES - Ash Area No. 3 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 Area No. 3 fugitive dust emissions inspection should include those areas identified in the Ash Area No. 3 fugitive dust control plan and indicated on the Ash Area No. 3 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.

Level of Use:
Information Use

**CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE
AREA NO. 3**

CCR-MON Ash
Storage Area 3
Revision: 0
Issued Date:
09/30/2015

ATTACHMENT B, ASH STORAGE AREA 3 WEEKLY MONITORING PROGRAM SURVEY MAP

Page 1 of 1



Level of Use:
Information Use

**CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE
AREA NO. 3**

CCR-MON Ash
Storage Area 3
Revision: 0
Issued Date:
09/30/2015

ATTACHMENT C, ASH STORAGE AREA 3 FUGITIVE DUSTING CITIZEN COMPLAINT LOG

Page 1 of 1

Attachment C - Montour SES - Ash Area No. 3 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.

Level of Use:
Information Use

**CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE
AREA NO. 3**

CCR-MON Ash
Storage Area 3
Revision: 0
Issued Date:
09/30/2015

ATTACHMENT D, ASH STORAGE AREA 3 RECORD OF PLAN REVIEW
Page 1 of 1

Attachment D - Montour SES - Ash Area 3 - 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.**

Level of Use:
Information Use

**CCR FUGITIVE DUST CONTROL PLAN - ASH STORAGE
AREA NO. 3**

CCR-MON Ash
Storage Area 3
Revision: 0
Issued Date:
09/30/2015

ATTACHMENT E, PROFESSIONAL ENGINEER CERTIFICATION

Page 1 of 1



Benjamin Robert Wilburn
Name of Qualified Professional Engineer

PE080739
Professional Engineer No.

Benjamin Wilburn 9/30/2015
Date Signed & Sealed