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Huntington Plant

Document Type	**PLANT POLICIES & PROCEDURES**			Document ID	**ENV-CCR FUGITIVE DUST**
Department:	**Environmental**			Review Date:	**1/8/2025**
Subject:	**CCR Fugitive Dust Control Plan**			Reviewed By:	**Russ Willson**
Approved By:	**Laren Huntsman**	Date: **1/8/2025**		Effective Date	**1/8/2025**

Revision Number	Reason for Revision	Date	MOC #
1	Updated speed limits on roads and administrative changes	10/05/18	N/A
2	Minor changes throughout document, Updated sources of water to be used for dust control.	9/21/2023	N/A
3	Removed references to the "Unpaved Ash Haul Road" to match the most current Title V permit on file. Added new fugitive dust suppressant water resources to Section 3.0.	1/8/2025	N/A
4			N/A

1.0 PURPOSE:

Per the requirements of 40 CFR § 257.80 of the Coal Combustion Residuals (CCR) rule, this *CCR Fugitive Dust Control Plan* provides measures which will be implemented to minimize CCR from becoming airborne at the Huntington Canyon plant, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

2.0 CCR UNITS AND FUGITIVE DUST CONTROL PLAN REQUIREMENTS:

2.1 This CCR fugitive dust control plan identifies and describes measures that will be used to minimize CCR from becoming airborne at the facility. This plan includes 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.

2.2 Regulated CCR units for this facility are described below:

2.2.1 Huntington Ash Landfill

3.0 CCR FUGITIVE DUST CONTROL MEASURES:

This section describes the measures utilized for the control of CCR fugitive dust emissions for each CCR rule-affected unit, road, and other CCR management and material handling activities at the facility.

Multiple levels of fugitive dust control will be used for each of the CCR fugitive dust sources. The first level describes the minimum level of fugitive dust control activity, while the subsequent levels describe control activities that are progressively more stringent.

Monitoring indicators that advance the control plan to different levels may be visual dust observations, weather conditions, spills, levels of equipment activity, equipment breakdowns, etc. The water truck driver(s) will use the monitoring indicators to determine the proper fugitive dust control level and the control activities for the current conditions. The contractor Foreman, Shift Supervisor and the Plant Environmental Staff will be used as resources to verify that proper decisions are made and that the proper controls are being used. Any time conditions indicate that the dust control needs are greater than Level 1, the Shift Supervisor will make the final determination of the dust control level and authorize the appropriate resources to be employed. The Shift Supervisor may request or call out additional dust control resources whenever they are needed, including the use of a sweeper truck.

"Several sources of water may be used for fugitive dust control at the CCR Landfill (when the application of water is the operative control measure), including, but not limited to, the following sources: (1) wastewater disposal basin, (2) cooling tower blowdown water, (3) settling/reclaim tank water, (4) evaporation pond wastewater and/or (5) raw water."

Adherence to these work practices will prevent employee exposure to fugitive dust and maintain compliance with the CCR regulations.

The following control levels shall be used with each CCR fugitive dust emission source:

Level #0 — No dust control measures are required due to rain, snow, no equipment activity (with no wind), or other conditions where no fugitive dust is occurring in any of the CCR handling/storage locations.

Level #1 — This is the **normal** dust control level until another level of control is triggered by a monitor indicator. **One** watering truck shall be used and the frequency of watering / washing shall be determined by the monitoring indicators and the potential level of dusting in each area. The minimum daily normal activities are described under each CCR fugitive dust source. Dust control using a sweeper truck can also be employed by Operations if needed.

Level #2 — **Two** watering trucks shall be used to perform the daily activities as described under Level #1 with an increased frequency of watering/washing in the locations where monitoring indicators show increased potential for dusting. Dust control using a sweeper truck can also be employed by Operations if needed.

Level #3 — In addition to all the control activities employed at Level #2. The speed limit on the ash haul roads shall be reduced to 15 mph. The speed limit sign will be changed by the water truck driver until dust conditions warrant a reduction to Level #2. Dust control using a sweeper truck can also be employed by Operations if needed.

3.1 Huntington Ash Landfill (Regulated CCR Unit)

For the Ash Landfill, the following measures have been implemented to control fugitive dust emissions from the CCR unit.

The inactive portions of the landfill are compacted and covered with bottom ash. Bottom ash is coarser than fly ash and this covering helps minimize fugitive dust generated during wind events. The completed sections of the landfill will eventually be covered with topsoil and seeded for coverage with vegetation.

The active area of the landfill is more susceptible to wind erosion and therefore shall be confined to the smallest practical area (usually five acres). Each day fugitive dust from active portions of the landfill will be controlled through wetting, compaction and/or covering with bottom ash and/or pyrites.

Under normal conditions, truckloads of water will be used daily for compaction and dust control. The configuration of the active ash cell and the monitoring indicators shall dictate number or truck loads of water to be used.

3.2 Fly Ash Unloading Area and Decanting Basins (CCR Management and Material Handling Area)

Water and waste lime slurry is mixed with the fly ash as it is loaded into a haul truck. This control system minimizes fugitive dust during the fly ash transfer and hauling process by wetting the fly ash. Dust generated from the transfer of fly ash into the truck shall be considered fugitive emissions and is subject to the opacity limitations established in the CCR rule for fugitive emissions.

Fly ash is a very fine particulate. Over time, fly ash accumulates on the paved area in the fly ash silo unloading area. Spillage caused by overloading trucks increases the potential for fugitive dust. Adequate freeboard on the ash haul trucks will be maintained in order to minimize spillage and fugitive dust emissions.

This area is to be cleaned as needed or whenever there are spills or evidence that ash is being tracked onto the paved haul road. Methods used to clean this area include, but are not limited to: flushing the area with water, front-end loader clean-up, or the use of a vacuum truck. CCR spillage that is flushed flows to two adjacent decanting basins where it remains in slurry until it is transferred to the bottom ash system or onto the drying pad.

This location also contains a wash down area where any accumulated CCR materials on the haul trucks can be cleaned. The materials that are removed from the trucks flow in slurry to the RCC decanting basins where they remain in slurry until they are hauled to the drying pad.

3.3 Ash Haul Road

To assist in dust control and safety, truck speeds on the ash haul road are to be limited. *A maximum speed of 20 mph* has been established for this road. Should

monitoring indicators exist where Level #2 control activities cannot control dust from vehicular traffic, the maximum speed shall be reduced to 15 mph. Drivers may lower individual truck speeds at any level to assist in controlling fugitive dust. Dust control using a sweeper truck can also be employed by Operations if needed.

Under normal conditions the ash haul road(s) shall be washed at least once daily. Water from the cooling tower blowdown storage tanks or raw water may be used for dust control. The frequency of the watering and/or the control level may change as the monitoring indicators dictate. Dust control using a sweeper truck can also be employed by Operations if needed.

3.4 Gypsum Load-out Area (CCR Management and Material Handling Area)

The load-out area receives moist scrubber gypsum material and has a sheeted wind barrier on three of four sides. The moist material, combined with the semi-enclosed area will provide sufficient dust control. If monitoring indicators prove otherwise, the CCR materials will be wetted with the water truck.

3.5 U1 and U2 Bottom Ash Load-out Areas (CCR Management and Material Handling Area)

The bottom ash load-out areas receive wetted bottom ash in a three-sided concrete containment. The moist material, combined with the semi-enclosed area will provide sufficient fugitive dust control. If monitoring indicators prove otherwise, the CCR materials will be wetted with the water truck. Any spilled ash from the load-out area will be cleaned and the area around the load-out will be wetted if fugitive dust monitoring determines the need.

3.6 CCR Drying Pad and Decanting Basin Drying Pad (CCR Management and Material Handling Area)

The CCR drying pad and decanting basin drying pad receives wet wastes removed from the decanting basins and from other areas around the plant. These CCR wastes are typically too wet to deliver to the landfill. The pads are constructed with three walls and a concrete bottom that contain the wastes. When the damp materials meet the paint filter test requirements they are transferred to the ash landfill. Liquids that gravity flow out of the wastes are captured in a sump. CCR materials on these pads are typically moist and not subject to fugitive dust concerns. If monitoring shows the need water will be applied to the CCR materials to prevent fugitive dust.

3.7 Waste Water Decanting Basins (CCR Management and Material Handling Area)

Waste water from plant operations and floor drains flows to two large decanting basins where the solids are settled and the water is pumped to the evaporation pond. CCR materials are present in the settled solids. These materials will remain in slurry in the decanting basins until they are removed to the drying pads for de-watering. The wetted CCR materials are typically not susceptible to wind erosion and pose

little threat to become fugitive dust. If monitoring indicators show the need for dust control, water will be applied.

4.0 CCR CITIZEN COMPLAINTS:

This CCR fugitive dust control plan includes a procedure to log the receipt of citizen complaints which pertain to the Huntington CCR fugitive dust control plan.

4.1 CCR Citizen Complaint Procedure

Upon the receipt of a citizen complaint pertaining to the Huntington CCR fugitive dust control plan, the following procedure shall be utilized to document the complaint. Utilize the *CCR Fugitive Dust Control Plan Citizen Complaint Form* appended to this CCR fugitive dust control plan to document all citizen complaints. The following information shall be recorded onto the form for all citizen complaints:

4.1.1 Name of citizen complainant. If the complainant is affiliated with a regulatory or non-governmental organization, include applicable affiliation information on the complaint form.

4.1.2 Date of receipt of citizen complaint.

4.1.3 Name, title and employee number of PacifiCorp employee documenting the citizen complaint.

4.1.4 Description of citizen complaint. The description must fully describe and document the nature of the complaint, including the affected CCR unit; the date and time of the incident; weather conditions at the time of the incident including temperature and wind conditions; and any other pertinent ambient or operational conditions. The complaint form shall document the media used to report the citizen complaint, indicating if the complaint was received in-person, via a phone call, e-mail, or letter.

4.1.5 Immediately upon receipt of a citizen complaint, PacifiCorp shall inspect the affected CCR unit, road or CCR management and material handling activity and document inspection observations on the complaint form. Documentation shall include observed CCR fugitive dust conditions. If possible, PacifiCorp shall photograph the CCR unit referenced in the complaint as soon as reasonably possible and include pertinent photographs with the completed citizen complaint form.

4.1.6 As applicable, identify and document corrective measures undertaken by PacifiCorp to address the citizen complaint

4.2 Following receipt of a CCR fugitive dust control plan citizen complaint and completion of the *CCR Fugitive Dust Control Plan Citizen Complaint Form*, the completed form shall be entered into the facility's CCR operating record.

5.0 EFFECTIVENESS ASSESSMENT

The CCR fugitive dust control plan shall be periodically reviewed to assess the effectiveness of the plan. The following procedure shall be utilized to assess the effectiveness of the CCR fugitive dust control plan.

At a minimum of once each calendar year, the CCR Fugitive Dust Control Plan shall be assessed to evaluate its effectiveness. The following procedure shall be utilized to document the effectiveness assessment:

Utilize the *Effectiveness Evaluation* form appended to this CCR fugitive dust control plan to document the periodic effectiveness assessment of the plan. The following information shall be recorded onto the effectiveness assessment form:

5.1 Name, title and date of PacifiCorp employee performing the effectiveness assessment.

5.2 Documentation of any citizen complaints received following the previous effectiveness assessment.

5.3 A description of any CCR fugitive dust control plan deficiencies recorded or observed following the previous effectiveness assessment.

5.4 A determination if the CCR fugitive dust control plan is effective or not effective. If the plan is determined to be not effective, the form shall describe corrective actions which have been initiated to address any deficiencies. If the CCR fugitive dust control plan is amended for any reason, the amended plan shall be placed in the facility's operating record.

6.0 AMENDMENT OF CCR FUGITIVE DUST CONTROL PLAN

The CCR fugitive dust control plan shall be amended whenever there is a change in conditions that would substantially affect the written plan in effect, such as construction and operation of a new CCR unit, or procedures and processes required to address any identified plan deficiencies.

Following the amendment of the CCR fugitive dust control plan, the amended plan shall be placed in the facility's operating record.

7.0 CCR FUGITIVE DUST CONTROL PLAN CERTIFICATION

The CCR fugitive dust control plan shall be certified by a qualified professional engineer that the CCR fugitive dust control plan, or any subsequent amendment of the plan, meets the requirements of 40 CFR 257.80.

8.0 CCR FUGITIVE DUST CONTROL PLAN ANNUAL REPORT

Utilize the *Annual CCR Fugitive Dust Control Report* form or similar document. An annual CCR fugitive dust control report shall be completed by October 31 of each year. Preparation of the annual CCR Fugitive Dust Control Report will consist of a review of the periodic CCR Unit Inspection Forms, Citizen Compliant Forms

and any other documentation concerning fugitive dust from the CCR unit, such as notices from any regulatory agency generated during the year preceding the report.

The report shall include the following for the twelve (12) months preceding the report:

- A description of the actions taken to control CCR fugitive dust.
- A record of all citizen complaints.
- A summary of any corrective measures taken.

The annual CCR fugitive dust control report is deemed complete when the report has been placed in the facility's operating record.

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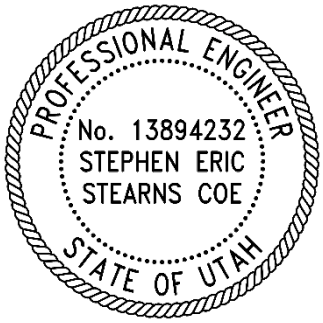
Huntington Plant
CCR Fugitive Dust Control Plan
Plan Certification

The undersigned Registered Professional Engineer is familiar with the requirements of Part §257.80 of Title 40 of the Code of Federal Regulations and has examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Fugitive Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part §257.80; that procedures have been established and that this Plan is adequate for the facility.

Name of Engineer: ***Stephen Eric Stearns Coe***	***Seal:*** 
Signature: 	***Date:*** ***January 14, 2025***
Registration No.: ***13894232***	***State:*** ***UT***

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Huntington Plant
CCR Fugitive Dust Control Plan
Citizen Complaint Form

Name of Complainant:	***Affiliation of Complainant (as applicable):***
Date and Time of Receipt of Citizen Complaint:	
Name, Title and Employee Number of PacifiCorp Employee Documenting Citizen Complaint:	
Description of Citizen Complaint: (Fully describe complaint, identify affected CCR unit, indicate date and time of incident, and indicate ambient conditions at time of incident.)	
Inspection Summary: (Upon receipt of citizen complaint, affected CCR unit shall be inspected by PacifiCorp. Indicate inspection observations and as applicable, photo-document CCR unit inspection.)	
Corrective Actions: (Following CCR unit inspection and evaluation, indicate corrective actions as applicable.)	

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Huntington Plant
CCR Fugitive Dust Control Plan
Effectiveness Evaluation

Name, Title:	***Date:***

Citizen Complaints:
(List CCR citizen complaints received following previous effectiveness evaluation and include date of citizen complaint and affected facility CCR unit, as applicable.)

CCR Fugitive Dust Control Plan Deficiencies:
(List and describe any CCR fugitive dust control plan deficiencies identified following previous effectiveness evaluation.)

CCR Fugitive Dust Control Plan Effectiveness Determination: Is the CCR fugitive dust control plan effective?	***Yes***	***No***

Corrective Actions, as Applicable:
(If the CCR fugitive dust control plan is determined to not be effective, describe corrective actions which have been initiated to address any deficiencies.)

Huntington Plant
CCR Fugitive Dust Control Plan
Annual CCR Fugitive Dust Control Report

Name, Title:	***Date:***

Description Of The Actions Taken To Control CCR Fugitive Dust:

Record Of All Citizen Complaints:

Summary Of Any Corrective Actions Taken: