

ELECTRIC PRODUCTION DEPARTMENT PROCEDURE MANUAL



HBPW ELECTRIC PRODUCTION DEPARTMENT STANDARD OPERATING PROCEDURE

TITLE	EP-4012
Fugitive Dust Control Plan for JDY Ash Pond System	

EFFECTIVE DATE	REVISION NUMBER	LAST REVISED
10/19/15	1	11/6/15

Introduction

This plan will fulfill the requirements found in the referenced regulation, 40 CFR 257 Subpart D.

This plan shall cover the measures taken to minimize coal combustion residuals (CCR) from becoming airborne at the James De Young facility CCR surface impoundment system, commonly referred to as the "JDY Ash Pond System". The procedure will also address CCR fugitive dust originating from facility roads and other CCR management and material handling activities at the site.

The JDY Ash Pond System consists of three sequential incised ash settling ponds. Ash pond #1 receives bottom ash from the facility boilers along with water from Lake Macatawa. Bottom ash settles out in the pond, and water, with reduced ash, flows to pond #2 and on to pond #3. The ponds are periodically dredged to maintain adequate pond volume and reduced flows

Measures taken

- 1) The ponds are located in the center of the JDY facility, approximately 200 feet from the down-wind property boundary.
- 2) The edges of the ponds are covered with vegetation to eliminate erosion.
- 3) A 5 foot high berm with tree and bush landscaping has been placed between the ponds and the down-wind property boundary.
- 4) Water cover is maintained in the three ash settling ponds.
- 5) Ash dredged out of the ash ponds is de-watered prior to disposal off site.
- 6) Water-spray on the facility roads and the temporary de-watering ash pile will be applied as needed, depending on the weather conditions.

- 7) Vehicle speed limit of 10 mph is posted for the roads in the facility.
- 8) Paved roads on the JDY facility are swept by the City twice a month from April – October.
- 9) Trucks hauling CCR for disposal are covered prior to transport.

Plan Effectiveness Evaluations

- 1) The effectiveness of the plan will be evaluated periodically by facility personnel. The effectiveness of the plan will be evident based upon observations of dust in and around the CCR impoundment system and related haul roads, and citizen complaints. The Plan can be modified as needed. Fugitive dust control measures can be changed, removed, or added at the BPW's discretion at any time necessary to ensure adequate dust control. Modification will be documented in a Plan Revision History Log. Operations personnel will then be made aware of and implement the plan modifications, and the modified plan will be made part of the operating record.
- 2) This plan will be reviewed annually at a minimum to assess effectiveness. The review will be scheduled via the INFOR work order system, under WO# PM- 004

Citizen Complaints

- 1) Complaints from the public relating to dust will be documented in a Citizen Complaint Log and investigated. Facility personnel will investigate the complaint and determine and verify the nature of the concern, location of dust and the weather, site operations and other factors contributing to the dust generation. Upon completion of the investigation, the facility will address the concerns as needed. If necessary to prevent similar conditions in the future, this plan will be modified and the modification documented in a Plan Revision History Log. Operations personnel will then be made aware of and implement the plan modifications, and the modified plan will be made part of the operating record.

Amendments to the Plan

- 1) The plan will be amended whenever there is a change in conditions that would substantially affect the written plan in effect.

Certification

- 1) The initial plan and any plan amendments will be certified by a qualified professional engineer to meet the requirements of section 40 CFR 257.80.

Annual Reports

- 1) An annual CCR Fugitive Dust Control Report will be prepared that includes a description of dust control activities, a record of all citizen complaints, a summary of any corrective measures

taken, and documentation of any modifications to the plan completed. The report will be placed in the operating record when it becomes available.

2) The initial report will be completed within 14 months of placing the initial plan in the operating record.

3) Subsequent annual reports will be completed within 12 months of the previous report.

Recordkeeping and Reporting

1) The initial plan and any plan amendments will be posted on the HBPW external website, under Electric Production, "CCR Rule Compliance Data and Information".

2) The State Director (MDEQ Division Chief, via specified email address) will be notified when the initial plan and any plan amendments have been placed in the operating record.

References

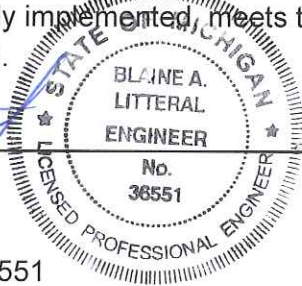
1) 40 CFR 257 Subpart D - Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments

Prepared by Judy N. Visscher, Environmental Regulatory Specialist DATE

Reviewed by Mike Radakovitz, Electric Production Superintendent DATE

I hereby certify that, based upon my having reviewed this plan, my inquiry of the personnel that prepared this plan, and my being familiar with the facility and the provisions of 40 CFR 257.80(b), this fugitive dust control plan, if properly implemented, meets the requirements of 40 CFR 257.80(b).

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11/06/2015
DATE

Blaine Litteral, P.E.

Professional Engineer license# 36551