B.C. Cobb Plant
151 Causeway
Muskegon, MI 49335-4401
SRN: 2836

Fugitive Dust Control Plan
For
Coal Combustion Residuals (CCR)

Date: 1/11/17
Rev: 01

Table of Contents

1.0 INTRODUCTION

The purpose of this Fugitive Dust Control Plan (FDCP) is to describe the measures adopted at the Consumers Energy B.C. Cobb (BCC) facility for minimizing fugitive dust emissions from coal combustion residuals (CCR). The BCC facility is located at 151 Causeway in Muskegon Michigan and was a coal fired electric generating power plant that ceased operation in April of 2016. This plan has been developed in accordance with the coal combustion residual (CCR) regulations stipulated in 40 CFR Part 257.80; which requires the development and implementation of a CCR fugitive dust control plan. A site Fugitive Dust Plan Coordinator (FDPC) has been appointed and is responsible for ensuring adequate resources are provided for controlling fugitive dust, as well as implementing the monitoring and recordkeeping requirements of this plan. This FDCP has been certified by a qualified professional engineer and is placed in the facility's CCR operating record and on the Consumers Energy public website. A notification is sent to the Michigan Department of Environmental Quality (MDEQ-waste division) within 30 days of posting any revisions of this document to the website.

The CCR facility, after generating plant decommissioning, consists of the Bottom Ash Pond and Ponds 0-8, and the surrounding road ways.

The appropriate control activities selected for the site are based on good engineering practices, in part, that were developed in accordance with Michigan's Fugitive Dust Regulations under Act 451 of 1994, Rule 324.5524 and the Michigan Fugitive Dust Guidance Document (March, 2014). The following sections outline the FDCP.

2.0 CCR OPERATIONS

2.1 DRY FLY ASH (DFA) HANDLING SYSTEM

The dry fly ash handling system was decommissioned in May of 2016. Most of the flyash left in the silo was pneumatically loaded to haul trucks and then hauled off site to the Consumers Energy J.H. Campbell plant for placement in a licensed landfill. The remaining residual ash was wet-removed by vac-truck and then placed into the Pond 8.

2.2 BOTTOM ASH POND AND PONDS 0-8

The wet ash handling system, when in operation, consisted of a conveying system, the Bottom Ash Pond and Ponds 0-8. CCR sluicing has ceased since the commencement of the decommissioning activities on April 15, 2016; however, non-CCR waste (contact water) continues to be collected and infiltrated from the unit. The bottom ash area has been graded and covered with straw matting while Ponds 0-8 remain in a wet and vegetative condition; thereby reducing the generation of fugitive dust.

2.3 ROADS

Fugitive dust emissions may be generated from vehicles and other heavy equipment traveling on the site's unpaved roads and entering/exiting the site; however, since all CCR generation has ceased and there is limited activity in the storage areas, there are no longer CCR impacted roadways. As a means to minimize fugitive dust in general, the ash pond and perimeter roadways were covered with limestone and then a more coarse stone at the road exit to pavement for "tire scrubbing" to minimize track-out

onto the paved roadway. Road wetting and brine application are implemented as necessary to minimize fugitive emissions from truck travel on the site roadways. A water truck is available through the on-site contractor. There is a site wide speed limit of 15 mph on non-paved roads to minimize fugitive dust generation.

3.0 MONITORING/RECORDKEEPING

3.1 MONITORING

The CCR storage areas are monitored daily on workdays for visual emissions and documented in the Daily Environmental Inspection Log.

A fugitive dust record is maintained that includes events such that visible emissions are observed reaching the site boundary.

Fugitive dust control techniques and/or activities which are used for any of the various site activities to control fugitive dust are documented.

3.2 RECORDKEEPING

The following records will be retained for a period of at least five (5) years:

- All actions taken to control CCR fugitive dust
- Record of all citizen complaints
- Summary of any corrective measures taken

4.0 CITIZEN COMPLAINTS

All complaints, concerns and/or inquiries and any resultant action shall be documented in the Fugitive Dust Complaint Log. Any complaint will be acted upon through internal communication procedures. Environmental Services and Legal shall be notified of any citizen complaint regarding CCR Fugitive Dust. In accordance with the CCR regulation, the complaint log and resultant actions will be summarized in the annual report.

5.0 PLAN ASSESSMENTS/AMENDMENTS

The FDCP will be audited utilizing Consumers Energy Compliance Assurance guidance once per year, coordinated by the site Fugitive Dust Plan Coordinator in order to periodically assess the effectiveness of the control plan. Results of the audit shall be reported to site management and Environmental Services.

This FDCP can be amended at any time provided that revisions are logged and the revised plan is placed in the facility's operating record. The Fugitive Dust Plan Coordinator is responsible for amending the written plan whenever there is a change in site conditions that would substantially affect the written plan in effect. All amendments to the fugitive dust control plan must be certified by a qualified professional engineer. A notice shall be sent to the MDEQ (Waste Division) within 30 days of when the plan is revised.

6.0 ANNUAL REPORTING

The fugitive dust plan coordinator will prepare an annual CCR fugitive dust control report that includes a description of the actions taken by plant personnel or contractors to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective actions taken. The report shall be reviewed by Environmental Services and Legal prior to posting to the operating record. The first annual report is due no later than 14 months after placing the plan in the facility's operating record and subsequent plans shall be completed one year after the date of posting the previous report. A notice will be sent to MDEQ (Waste Division) within 30 days of posting the annual report.

7.0 CERTIFICATIONS

CCR Fugitive Dust Plan, Professional Engineer Certification:
By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 257.80, that I or my designated agent have visited and examined the facility, that this CCR FDP has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required fugitive dust minimization activities, monitoring, and reporting have been established and that the Plan is adequate for the facility.

Kathryn M. Cunningham — Professional Engineer
44447 — Registration Number (MI)

Professional Engineer (Signature)
1/11/17 — Date of Plan Certification:

CCR Fugitive Dust Plan Management Approval:
This Plan is certified as being prepared in accordance with good engineering practices. Thus, this Plan has the full approval of Consumers Energy Company Management. I am at a level of sufficient authority to commit the necessary resources to implement this Plan as described. I have appointed the following representative as the Fugitive Dust Plan Coordinator: Robert Strugarek

Shaun Casey
EPM Sr. Project Manager

1/11/17 — Date

8.0 REVISION HISTORY

Revision Number	Date of Revision	Reason(s) for Revision
0	10/12/15	Original Edition
1	11/30/16	Updated for Site Decommissioning