



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

**Fugitive Dust Control Plan
For
Coal Combustion Residuals (CCR)**

Date: 12/3/2018
Rev: 03

Table of Contents

1.0	Introduction.....	3
2.0	CCR Operations	3
2.1	Dry Fly Ash (DFA) Handling System	Error! Bookmark not defined.
2.2	Bottom Ash Ponds.....	3
2.3	Roads.....	3
3.0	Monitoring/Recordkeeping.....	4
4.0	Citizen Complaints.....	4
5.0	Plan Assessments/Amendments.....	4
6.0	Annual Reporting.....	5
7.0	Certifications	5
8.0	Revision History.....	6

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) property for minimizing fugitive dust emissions from coal combustion residuals (CCR). The former 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 implementing the monitoring and recordkeeping requirements of this plan, ensuring that records are stored with Environmental Services. The Consumers Energy Systems Engineering Department is responsible for ensuring adequate resources are provided for controlling fugitive dust. 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 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 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 and subsequent sale of the plant property. Only precipitation and run-off now feed these ponds. Ponds 0-8 remain in a mostly dewatered but wet and vegetative condition, thereby reducing the generation of fugitive dust.

2.2 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. When construction activities to close the ponds begin, the roadways may again be impacted. As a means to minimize fugitive dust in general, some of 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 can be made available through contracted services and there is a site-wide speed limit of 15 mph to minimize fugitive dust generation.

3.0 MONITORING/RECORDKEEPING

3.1 MONITORING

The CCR storage areas were monitored weekly on workdays through November 2nd, 2018. Monitoring frequency will remain weekly when no construction activity is occurring. Once construction activity that has the potential to cause fugitive dust emissions begins, a visual inspection is required for the CCR facilities and surrounding roads for each day that activity takes place. All monitoring and any corresponding corrective action(s), as required, shall be documented on the CCR Fugitive Dust Inspection Log or a similar document.

Fugitive dust control techniques and/or activities (such as sealant application or road brining) which are used for any of the various site activities to control fugitive dust shall also be documented.

3.2 RECORDKEEPING

The following records will be retained for a period of at least five (5) years during the active life of the CCR units:

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

All annual reports will continue to be retained for a minimum of 5 years.

4.0 CITIZEN COMPLAINTS

All complaints, concerns and/or inquiries from the public, governmental agency, or interest group shall be documented in the Corporate Environmental External Communications Log (SP-7430), along with any corrective actions. 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 any 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 Environmental Services in order to periodically assess the effectiveness of the control plan. Results of the audit shall be reported to the Asset Manager.

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 FDPC is responsible for communicating to the Environmental Services CCR lead whenever there is a change in site conditions that would substantially affect the written plan in effect. Environmental Services is responsible for amending the plan as necessary. All amendments to the fugitive dust control plan must be certified by a qualified professional engineer. A notice shall be send to the MDEQ within 30 days of when the plan is revised.

6.0 ANNUAL REPORTING

The FDPC will assist Environmental Services in preparing an annual CCR fugitive dust control report that includes a description of the actions taken 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 the Plan Manager (see Section 7.0) and Legal prior to posting to the operating record. Annual reports shall be completed and posted in the operating record one year after the date of posting the previous report. A notice will be sent to MDEQ 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 FDCP 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.

Matthew D. Hall
Professional Engineer

6201062989
License Number (MI)


Professional Engineer (Signature)

12/3/2018
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: Michelle Marion


George McKenzie
GE&S Sr. Engineering Lead II

12/6/18
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
2	10/20/17	Updated for annual audit, reduced monitoring during non-construction days, and personnel responsibility changes
3	12/3/18	Removed the Dry Fly Ash Handling system from references; updated FDPC appointment; updated Certifying Professional Engineer.