



**D.E. Karn and J.C. Weadock Facility
2742 North Weadock Hwy
Essexville, MI 48732
SRN: B2840**

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

Date: 5/31/18
Rev: 03

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1.0 INTRODUCTION

The purpose of this Fugitive Dust Control Plan (FDCP) is to describe the measures adopted at the Consumers Energy D.E. Karn (Karn) facility for minimizing fugitive dust emissions from coal combustion residual (CCR) handling operations. The scope of this plan covers CCR generated from coal fired boiler units, DE Karn Units 1 and 2, as well as CCR areas at the J.C. Weadock (Weadock) facility that ceased power generation from Boiler Units 7 and 8 in March 2016.

This plan has been developed in accordance with the coal combustion residual regulations stipulated in 40 CFR Part 257.80. The scope of this plan includes active CCR units as well as their corresponding roads, handling and control equipment, and associated activities therein. 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. The initial FDCP was posted and made available to the public on October 19, 2015. All subsequent revisions are posted to the operating record and public website, with a notification sent to the Michigan Department of Environmental Quality (MDEQ) within thirty (30) days of that posting.

The CCR facilities at the Karn – Weadock site consist of:

- Karn Bottom Ash Lined Impoundment – This wet system removes bottom ash from the main burner area of the boiler and sluices it by water into the Impoundment area.
- Karn Bottom Ash Pond – The Karn bottom ash pond no longer accepts wet CCR bottom ash and has been graded in preparation for closure activities. The closure by removal, commencing in 2019, will consist of excavating the CCRs and re-grading the area to manage stormwater runoff.
- Weadock Bottom Ash Pond – The Weadock bottom ash pond no longer accepts wet CCR bottom ash and has been graded in preparation for closure activities. The closure by removal, starting in 2020, will consist of excavating the CCRs and re-grading the area to manage stormwater runoff.
- Weadock Landfill - A licensed landfill that historically received ash from Weadock Boiler Units 7 and 8; however currently received ash byproduct (ash, unspent and spent lime and carbon sorbent) from the Karn 1 and 2 Boiler Units.

The appropriate fugitive dust control activities selected for the site are based on good engineering practices based on:

- Engineering Control Plans developed for both the Karn and Weadock Landfills
- The Operating License for the Weadock Landfill (#9440)
- Michigan's Fugitive Dust Regulations under Act 451 of 1994, Section 324.5524, as required by the site's Renewable Operating Permit

2.0 CCR OPERATIONS

2.1 BYPRODUCT HANDLING SYSTEM (GENERATION TO DISPOSAL SILOS)

The Karn 1 and 2 byproduct handling system includes a pneumatic collection system that transfers the CCR byproduct from the collection hoppers located under the PJFFs to the disposal storage silos or the byproduct recycle silos. The byproduct is pneumatically conveyed through hard piping under vacuum conveyance from the PJFF hoppers to the byproduct silo. A filter separator separates the byproduct from the conveying air through filter media. The byproduct drops into the silo and the conveyance air is pushed through the filter separator fabric filters. The silo displacement air, which may contain particulates, is controlled by a bin vent fabric filters.

The byproduct handling system is not operated unless the dust control systems are operating properly.

2.2 LANDFILL OPERATIONS (DISPOSAL SILO TO LANDFILL)

2.2.1 SILO OPERATION/TRUCK LOADING

The disposal and recycle silos are equipped with bin vent fabric filter dust collectors. The dust collectors operate when the silos are being filled. At the disposal silo, the byproduct is thoroughly mixed with water utilizing a paddle mixer (Dustmaster™). The ash is conditioned to a moisture content which displays properties of being dustless, and of a “ball forming” consistency. These properties are typically exhibited with a moisture content between 12-30%. Proper conditioning of the byproduct with water and/or suppressant is to achieve a moisture content that will prevent wind dispersal and provide proper stability characteristics for the landfill, but will not result in free liquids. From the mixer, the conditioned byproduct drops down through a chute into the haul truck. A fogging system and dust curtains are used during this material transfer as needed. At least one of the two building doors must be closed prior to start of load out operation to reduce the “wind tunnel effect”, and any ash spillage shall be cleaned up and disposed of properly. The following operational controls are also in place:

- The appropriate moisture characteristics shall be maintained during the mixing/truck loading process.
- Transport truck bodies will be maintained in good condition and properly closed to prevent leakage.
- Truck bodies will be filled in a manner that minimizes fugitive emissions during transport (minimize exposed peaks above sideboards).
- Transport operations will be suspended if the local weather forecast or current conditions indicate that operations cannot be conducted in a controlled manner.
- Roll mesh screens will be used on trips for disposal as necessary or if winds are in excess of 20 miles per hour.

2.2.2 CCR - PLACEMENT AND STORAGE

The bulk of the CCR byproduct is being beneficially re-used for landfill closure activities at the Karn Landfill, which is not a CCR unit. The on-site licensed Weadock landfill also accepts the CCR waste from Karn 1 and 2. The conditioned byproduct is placed in the landfill cell by dumper truck and further wetted as required to minimize dusting during spreading by bulldozer. The conditioned ash piles are to be flattened and compacted as they are deposited, utilizing water as necessary. An excavator may also be used for shaping the piles/slopes. All dumping, dozing, and excavating activities are visually monitored for emissions. Mitigation activities are implemented or operations are suspended if there are visible emissions. The following operational controls may be utilized for ash placement and storage.

- Condition the ash surface by compaction, moisture, chemical dust suppressants, coarse cover material, vegetation or other capping materials to prevent wind erosion.
- Reduce wind in the work area to reduce potential for wind transport, including utilizing the protective berm concept, existing dikes, planned lifts, and temporary wind screens, where applicable, to reduce wind velocities and manage fugitive dust.
- Develop the site according to the sequence outlined in the fill progression plan
- A tank truck with equipment to apply water uniformly will be available on site at all times
- Ash spreading and compaction will be accelerated under conditions conducive to dust formation to reduce exposure time.
- Ash excavation, loading, unloading and placement will be suspended when the local weather forecast or current conditions indicate that such activities cannot be conducted in a controlled manner.

The following general procedures are in place for fugitive dust control of inactive cell areas:

- Inactive areas that have reached final grade shall use final cover materials and vegetation as specified in the Engineering Plan.
- Inactive areas that have not reached final grade shall be compacted and/or rolled into a "concrete" like surface. A tackifier can also be sprayed on the surface as a dust suppressant agent.

2.3 WET CCR - BOTTOM ASH HANDLING

The wet ash handling system consists of a conveying system and the lined bottom ash impoundment that meets the criteria of 40 CFR 257.72(c). Bottom ash from Boiler Units 1 and 2 is hydraulically sluiced through the discharge trestle to the Impoundment where it is allowed to settle out from the sluice water. The ash sluice water overflows into another chamber (not part of the regulated impoundment) and discharges to a monitored internal outfall at the Combined Discharge Channel prior to the discharge at the external NPDES permitted outfall to Saginaw Bay.

The primary settling portion of the lined impoundment is dredged by an excavator to remove the bottom ash sediment approximately once per week during normal unit operation. This primary settling portion of the lined impoundment is located directly downstream from the sluice piping and is protected by a layer of concrete. The sediment is stockpiled within the impoundment area to de-water before hauling. The bottom ash can be disposed in the Weadock landfill, or it can be beneficial re-used within the Karn or Weadock landfill boundaries (following placement criteria in Section 2.2.2 of this plan as well as criteria called out in other applicable engineering plans), or hauled off-site for any other MDEQ approved beneficial re-use. The bottom ash pile can be wetted with the water truck cannon to minimize fugitive dust as necessary.

The lined ash impoundment itself is operated in a wet condition and does not require active fugitive dust control. Measures to control fugitive dust from the stockpiled bottom ash and roads surrounding the ponds are addressed in the next section.

2.4 ROADS

Fugitive dust emissions may be generated from trucks and other heavy equipment traveling on the site haul roads and entering/exiting the site. Access roads utilize coarse bottom ash or other approved materials as base and/or topper. Road wetting is implemented as necessary to minimize fugitive emissions from truck travel on the site roadways. A water truck is available on site to wet roads as needed. 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 entire CCR system is monitored through visual checks of process equipment and the corresponding particulate matter control devices as follows:

Daily visible emission inspections are conducted on the ash handling dust collectors, during periods of dry handling system equipment operation. Proper operation is defined as no visible emissions.

- If any visible emissions from a pollution control device are observed, appropriate actions will be taken immediately to stop emissions. If emissions from the pollution control device cannot be eliminated, the malfunctioning equipment will be removed from service immediately and a maintenance notification shall be submitted for repairs. The above actions shall be recorded in the Operations Log and notice sent to the FDPC.

The byproduct handling dust collector differential pressures and pressure tap readings are logged into the plant Data Control System (DCS), with alarm set-points programmed to alert operators if pressure is too high.

- If a pollution control device is operating outside of the normal differential pressure range, a repair action is initiated by submitting a maintenance notification to the Production Supervisor. The pollution control device shall be restored to normal operation as soon as possible.

The site maintains necessary spare parts on site for routine repairs of the control and monitoring equipment.

Daily, active landfill areas are visually inspected for drying and water is applied as needed if surface drying is evident.

A fugitive dust record is maintained that includes events such as visible emissions observed reaching the site boundary, as well as of suspended activities due to fugitive dust emissions issues. The date, cause and corrective action taken shall be logged relative to suspended activities.

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:

- 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 site's External Communication Log. Any citizen 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 FDPC in order to periodically assess the effectiveness of the control plan. Results of the audit shall be reported to site management and Corporate 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 FDPC 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 of when the plan is revised.

6.0 ANNUAL REPORTING

The FDPC 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 reports shall be completed 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.

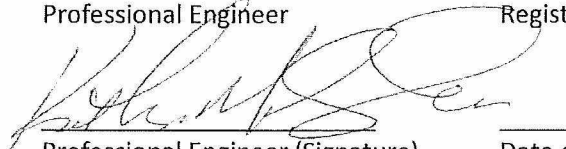
7.0 CERTIFICATIONS

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, 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.

Kathryn M. Cunningham
Professional Engineer


44447
Registration Number (MI)


Professional Engineer (Signature)

5/31/18
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 CCR Fugitive Dust Plan Coordinator: Caleb Batts


Avelock Robinson
Site Business Manager

6.6.2018
Date

8.0 REVISION HISTORY

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