



**J.R Whiting Plant
Erie, MI
SRN: B2846**

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

Date: 9/15/2017
Rev: 02

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1.0 INTRODUCTION

The purpose of this Fugitive Dust Control Plan (FDCP) is to describe the measures adopted at the JR Whiting facility for minimizing fugitive dust emissions from coal combustion residual (CCR) handling operations (also known as ash handling operations). The CCR units covered by this FDCP are located to the east of the former JR Whiting facility which was located at 4525 Erie Road in Erie, Michigan which ceased operation on April 12, 2016. This plan has been developed in accordance with the coal combustion residual regulations stipulated in 40 CFR Part 257, subpart D. The scope of this plan includes the active CCR units and their corresponding roads 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 and is placed in the facility's CCR operating record and on the Consumers Energy Website. The initial FDCP was posted and made available to the public by October 19, 2015, with a notification sent to the Michigan Department of Environmental Quality (MDEQ-Waste Division) within 30 days of that posting. All Subsequent revisions are posted to the operating record and the public-facing web site with a notice sent to the MDEQ of that posting.

The CCR facility currently consists of Ash Ponds 1 and 2 and the respective access roads as Pond 6 has received final cover and reached 70% vegetation germination. There are no further fugitive dust requirements for Pond 6 with regard to Michigan Part 115 Rules, as the landfill is no longer operating. Please see the regulatory reference below:

R299.4315 (5) - (5) Measures shall be provided to control fugitive dust, odors, and other emissions at a type III landfill. These measures shall be sufficient to ensure that the operation of the landfill will not produce any emission that results in a violation of Part 55 of the act.

The appropriate control activities selected for the Ash Pond 1 and 2 and the corresponding roads are based on good engineering practices, in part, that were developed for the Engineering Control Plan (1991) that was submitted and approved by the Michigan Department of Environmental Quality, as well as in accordance with Michigan's Fugitive Dust Regulations under Act 451 of 1994, Rule 324.5524. The following sections outline the FDCP.

2.0 CCR OPERATIONS

2.1 STORAGE

The Ash Storage ponds are no longer actively accepting CCR material, however excavating activities may be a part of the Pond 1 and 2 closure and are visually monitored for dusting during the construction season. Activities are suspended if there is excessive dusting (ie. dust leaving the site boundaries) or when there are sustained wind speeds of over 20 mph. Ash Ponds 1 and 2 are mostly covered with vegetation and/or are sufficiently wet (contain standing water) which controls formation of fugitive dust.

2.2 ROADS

Fugitive dust emissions may be generated from trucks and other heavy equipment traveling on the site haul roads and entering/exiting the site. To control fugitive dust, road wetting and brine application are implemented as necessary to minimize fugitive dust emissions from travel on the site roadways. Water trucks are available and used on site during the construction season. There is a site wide speed limit of 15 mph on non-paved roads to minimize fugitive dust generation from roadways.

3.0 MONITORING/RECORDKEEPING

3.1 MONITORING

Daily visible emission inspections are conducted on 1 and 2 Ash Ponds during construction days, and weekly during the off season when no construction activities are taking place. These inspections are documented on the Fugitive Dust Inspections Checklist.

A fugitive dust record is maintained that includes events such as visible emissions observed reaching the site boundary, as well as of suspended activities (as reported by Ash Pond Contractor Supervisor). 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 are also 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 that result in an action shall be documented in the External Communications Log in SharePoint. Environmental Services and Legal shall be notified of any citizen complaint regarding CCR Fugitive Dust. In accordance with the CCR regulation, external complaints 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 Corporate Environmental Services.

This FDCP may 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 days 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. 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 (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, 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)

9/15/17
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: Frank Rand

Corrie Meeks / Thomas Shields
EPM Project Managers

9/15/2017
Date

8.0 REVISION HISTORY

[illegible]