

COAL COMBUSTION RESIDUALS

FUGITIVE DUST CONTROL PLAN

Prepared for:

Cheswick Plant Environmental Redevelopment Group, LLC
Cheswick Lefever, LLC
Cheswick Generating Station
Springdale, Pennsylvania

Prepared by:



Aptim Environmental & Infrastructure, LLC
Pittsburgh, Pennsylvania

September 2015
Rev. 03 November 2022

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Figure 1 – Site Layout and Potential CCR Fugitive Dust Sources

Attachment A – Recordkeeping Logs

Plan Review/Assessment Log

Date of Review	Reviewer Name	Amendment Required (YES/NO)	Sections Amended and Reason
September 2015	Jill Buckley, NRG Steve Frank, NRG Jesse Varsho, CB&I	NA	Original Plan
February 2017	Jill Buckley, NRG Steve Frank, NRG David Shott, CB&I Laurel Lopez, CB&I	YES	Rev. 01: Section 2.2.3, Section 4.2, Figure 1, and Log RCW 5.10-1 (Attachment A); revised to incorporate remote drag chain system for bottom ash handling.
December 2021	William McGraw, GenOn Steve Frank, GenOn David Shott, APTIM Sirous Djafari, APTIM	YES	Rev. 02: Section 1.0, Section 2.2.3, Section 4.2.1, Section 5.0 and Figure 1; revised to reflect the closure of the Recycle and Emergency Bottom Ash Ponds. Attachment A; revised Operations Checklist and deletion of Logs RCW 5.6-1 and RCW 5.8-1 (incorporated into Log RCW 5.10-1).
November 2022	Rick Ravotti, Charah Gary Deigan, Deigan David Shott, APTIM Robert Stolz, APTIM	YES	Rev. 03: Entire Plan; revised to reflect change in ownership and cessation of station operations as of April 1, 2022.

1.0 Introduction

On December 19, 2014, the administrator of the United States Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015 and became effective on October 19, 2015. The Rule establishes a comprehensive set of requirements for the disposal of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include compliance with location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action, and closure and post-closure care aspects. The operating criteria include air criteria specified in Title 40 of the Code of Federal Regulations (CFR), §257.80 to address the potential pollution caused by windblown dust from CCR units. According to the Rule, owners or operators of CCR units must adopt measures that will effectively minimize CCR from becoming airborne at the facility by developing and operating in accordance with a fugitive dust control plan (Plan) with adequate dust control measures.

The Cheswick Generating Station, owned/managed by the Cheswick Plant Environmental Redevelopment Group, LLC, is a former coal-fired power plant located in Springdale, Pennsylvania. As of April 1, 2022, the station ceased operations and is presently being decommissioned in preparation for eventual demolition. The Rule applies to this facility due to the management of CCR that was generated from the previous combustion of coal. The only remaining CCR unit associated with the station includes the Cheswick Ash Disposal Site, following Closure by Removal in early-2021 of the two previously existing impoundments referred to as the Bottom Ash Recycle Pond and the Bottom Ash Emergency Pond. Documentation of the closure activities as performed in accordance with §257.102(c) is contained in a Closure Certification Report (GAI Consultants, Inc., April 2021), a copy of which is available on the publicly accessible website per §257.107(i)(8). The Ash Disposal Site is owned/managed by Cheswick Lefever, LLC.

This Plan has been prepared to comply with the requirements as specified in §257.80(b)(1-7) of the Rule, including certification by a professional engineer as documented in Section 7.0 of this Plan. Additionally, this Plan (and any amendments thereto) will be placed in the Cheswick facility's operating record per §257.105(g)(1), noticed to the State Director per §257.106(g)(1), and posted to the publicly accessible internet site per §257.107(g)(1).

2.0 Facility Description

2.1 Process Overview

The Cheswick Station is located at the intersection of Pittsburgh and Porter Streets in Springdale, Pennsylvania. Prior to its shutdown on April 1, 2022, the facility utilized one main boiler (exhausting through a single stack) which fired on coal as the primary fuel and natural gas as an auxiliary fuel during startup, shutdown, and upset conditions. Pollution control equipment for the main boiler included low nitrogen oxide (NO_x) burners, an electrostatic precipitator (ESP) with flue gas conditioning for particulate matter control, a selective catalytic reduction system for NO_x control, and a Flue Gas Desulfurization (FGD) system unit to reduce sulfur dioxide (SO₂) emissions. The FGD unit utilized a wet limestone scrubber with forced oxidation that produced commercial-grade gypsum available for use in wallboard manufacturing.

2.2 CCR Fugitive Dust Sources

As acknowledged in Section 1.0 of this Plan, the Cheswick Station ceased operations as of April 1, 2022. Accordingly, there is no longer routine generation and management of CCR materials, including fly ash, bottom ash, and gypsum. Ongoing and future cleaning and decommissioning activities of certain structures and equipment items may generate incidental amounts of CCR and non-CCR materials, which may be taken to the Cheswick Ash Disposal Site.

2.2.1 Cheswick Ash Disposal Site

The Cheswick Ash Disposal Site is located approximately three miles from the Cheswick Station proper. The Ash Disposal Site has been identified as an existing CCR landfill according to the Rule. Presently, any CCR materials that are incidentally generated from the decommissioning activities are transported by tarped trucks from the station to the ash disposal site where they are dumped and then spread and compacted with a bulldozer.

2.2.2 Fly Ash Handling

Effective with the April 1, 2022 cessation of operations, fly ash is no longer generated at the station.

2.2.3 Bottom Ash Handling

Effective with the April 1, 2022 cessation of operations, bottom ash is no longer generated at the station.

2.2.4 Gypsum Handling

Effective with the April 1, 2022 cessation of operations, gypsum is no longer generated at the station.

2.2.5 *Transport Roadways*

As described above and following the cessation of operations, trucks will continue to transport any incidentally generated CCR materials (from the decommissioning activities) to the Cheswick Ash Disposal Site. Within the limits of the Cheswick Station, the trucks travel on paved roads. Once outside the station, the public roadways and the initial portion of the Ash Disposal Site internal road are paved. The internal road transitions from a paved to unpaved surface as approach is made to the actual operating footprint of the Ash Disposal Site. The internal and public roadways and haul routes are shown on Figure 1 of this Plan.

3.0 Fugitive Dust Control Regulatory Requirements

3.1 CCR Rule Air Criteria

Under the Rule, the owner or operator of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

In order to document these measures, the owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan. According to §257.80(b), the Plan must include the following elements:

- Identification and description of the CCR fugitive dust control measures that will be used to minimize CCR from becoming airborne at the facility, along with an explanation of how the measures selected are applicable and appropriate for site conditions.
- Description of procedures used to emplace CCR as conditioned CCR at CCR landfills. (Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids.)
- Description of procedures used to log citizen complaints received by the facility involving CCR fugitive dust events.
- Description of procedures to periodically assess the effectiveness of the Plan.

The Plan should be updated anytime there is a change in conditions that would substantially affect the written Plan.

In addition to the fugitive dust control plan, §257.80(c) requires the owner or operator of a CCR unit to file an annual fugitive dust control report.

3.2 Other Fugitive Dust Regulatory Requirements

Prior to the promulgation of the Rule, the Cheswick Ash Disposal Site has been required by other regulations and permits to minimize and monitor fugitive dust from the site as discussed below.

3.2.1 Solid Waste Permit

The Cheswick Ash Disposal Site is operated under Solid Waste Permit No. 300720 issued by the Pennsylvania Department of Environmental Protection (PADEP). The disposal site is operated according to the terms in this permit and the associated PADEP Form G(A), “Air Resources Protection Dust Emissions Estimate and Control Plan,” submitted with the solid waste permit application. The permit and Form G(A) include the following requirements related to fugitive emissions at the Ash Disposal Site:

- Seven dust fall monitors are installed at the Ash Disposal Site in locations approved by PADEP. Dust fall reports are submitted to PADEP quarterly.
- Vehicle traffic is limited to 15 miles per hour (mph) within the Ash Disposal Site.
- All trucks shall be covered with tarps to minimize dust emissions during transit.
- A water tank truck will be used as necessary to suppress dust on active disposal areas, roadways, and parking areas.
- Prior to departure from the site, trucks will pass through a truck washing station to minimize dust emissions during transit.

4.0 Fugitive Dust Control Practices and Procedures

4.1 Fly Ash Handling

Effective with the April 1, 2022 cessation of operations, fly ash is no longer generated at the station.

4.1.1 Monitoring/Recordkeeping

Prior to the cessation of operations, observations of visible emissions from the fly ash handling activities were performed once per week by station personnel during normal daylight hours. Corresponding records of the observations were documented in logs as follows:

- Daily records of each time the water suppression system was used at the fly ash silo (Log RCW 5.9-1A)
- Weekly records of visible emission observations of the fly ash handling operations and observations of fly ash wetting (Log RCW 5.10-1)

The completed logs were forwarded to the station's Environmental Manager and will be retained for at least five years, or until such time as deemed no longer necessary.

4.2 Bottom Ash Handling

Effective with the April 1, 2022 cessation of operations, bottom ash is no longer generated at the station.

4.2.1 Monitoring/Recordkeeping

Prior to the cessation of operations, observations of visible emissions from the bottom ash handling activities were performed once per week by station personnel during normal daylight hours. Bottom ash handling records and visible emissions observations were maintained in weekly logs (Log RCW 5.10-1) and forwarded to the station's Environmental Manager. The completed logs will be retained for at least five years, or until such time as deemed no longer necessary.

4.3 Gypsum Handling

Effective with the April 1, 2022 cessation of operations, gypsum is no longer generated at the station.

4.3.1 Monitoring/Recordkeeping

Prior to the cessation of operations, observations of visible emissions from the gypsum handling activities were performed once per week by station personnel during normal daylight hours. Gypsum handling records and visible emissions observations were maintained in weekly logs (Log

RCW 5.4-1) and forwarded to the station's Environmental Manager. The completed logs will be retained for at least five years, or until such time as deemed no longer necessary.

4.4 *Transport Roadways*

Paved and unpaved road surfaces internal to the station and the Cheswick Ash Disposal Site (refer to Figure 1) are watered, as needed, to reduce fugitive dust emissions, and this continues to apply during the ongoing decommissioning activities. The amount of time dedicated to watering the roads is a function of the dryness of the surface and is determined through daily observations by station personnel. The amount of water used varies seasonally. Roads and parking lots are also periodically swept to reduce potential entrainment of dust. Fugitive dust emissions are further controlled by posting and maintaining a maximum vehicle speed limit of 10 mph within the boundaries of the station property.

Any trucks exiting the station that may be carrying CCR materials (incidentally generated from the ongoing decommissioning) are equipped with automatic tarping systems that are designed to provide an adequate seal and prevent windblown CCR emissions during transport. Drivers routinely inspect the tarping system for proper closure and tears, rips or any other defects that could contribute to excessive dust emissions during transport.

4.5 *Cheswick Ash Disposal Site*

Effective with the April 1, 2022 cessation of operations, routine transport of CCR materials to the Cheswick Ash Disposal Site has been discontinued. However, fly ash, bottom ash, or gypsum that may be incidentally generated from the ongoing decommissioning activities will continue to be transported by tarped and washed trucks from the station to the Ash Disposal Site. Fugitive dust is minimized at the Ash Disposal Site by spreading and compacting the materials with a bulldozer as soon as practical after being delivered (i.e., the freshly dumped materials are not left on the landfill surface for extended periods of time). Additionally, a water truck regularly circulates as needed, to spread water on the internal roadways and the open operating areas of the disposal site. Vehicle traffic operating within the disposal site is restricted to a 15 mph speed limit. Before exiting the Ash Disposal Site and returning to public roadways, trucks are required to pass through a truck wash to remove excess dust.

4.5.1 *Monitoring/Recordkeeping*

Seven dust fall monitors are installed at the ash disposal site in locations approved by PADEP. Dust Fall Reports are submitted to PADEP quarterly as a condition of the Solid Waste Permit. Records of dust control activities, including road watering and sweeping, are maintained as part of a Daily Operations Checklist. A blank copy of the checklist is included in Attachment A. The completed checklists are forwarded to the station's Environmental Manager and will be retained for at least five years, or until such time as deemed no longer necessary.

4.6 *Annual Reporting*

In accordance with §257.80(c) of the Rule, the station must prepare an Annual Fugitive Dust Control Report that includes the following information:

- A description of actions taken to control CCR fugitive dust
- A record of all citizen complaints
- A summary of any corrective actions taken

The first annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the Cheswick facility's operating record. Subsequent annual reports will be completed one year after the date of the initial annual report. Additionally, as required, the annual reports will be placed in the Cheswick facility's operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the newly established publicly accessible internet site per §257.107(g)(2).

5.0 *Procedures for Citizen Complaints*

In accordance with §257.80(b)(3) of the Rule, this section outlines the procedure that Cheswick Station follows to log citizen complaints involving fugitive dust events at the station and the Ash Disposal Site. Within 24 hours of receiving a citizen complaint, the station's Environmental Manager will enter the complaint into the station's Environmental Management Information System (EMIS) database. Following initial evaluation of the complaint, Cheswick Station will then conduct a thorough investigation to confirm the reported incident/conditions and implement corrective actions as may be warranted.

Citizens can contact the Cheswick Generating Station directly at 724-275-1400.

6.0 Procedures for Plan Assessments and Amendments

Whenever new or modifications of existing processes are planned, the station's Environmental Manager will evaluate the project for potential changes to this Plan. In accordance with §257.80(b)(6) of the Rule, the Plan will be amended to add any new CCR units or to update any modifications in the operation of existing fugitive dust sources. The amended Plan will be reviewed and recertified by a registered professional engineer and will be placed in the Cheswick facility's operating record as required per §257.105(g)(1). The amended Plan will supersede and replace any prior versions. Availability of the amended Plan will be noticed to the State Director per §257.106(g)(1) and posted to the newly established publicly accessible internet site per §257.107(g)(1).

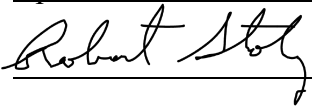
A record of Plan reviews/amendments is provided on the first page of this document, immediately following the Table of Contents.

7.0 Professional Engineer Certification

The undersigned registered professional engineer is familiar with the requirements of §257.80 and has visited and examined the Cheswick station or has supervised examination of the Cheswick Station by appropriately qualified personnel. The undersigned registered professional engineer attests that this CCR Fugitive Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of §257.80, and that this Plan is adequate for the Cheswick Station. This certification was prepared as required by §257.80(b)(7).

Name of Professional Engineer: Robert Stolz

Company: Aptim Environmental & Infrastructure, LLC

Signature: 

Date: November 28, 2022

PE Registration State: Pennsylvania

PE Registration Number: PE048820E

Professional Engineer Seal:

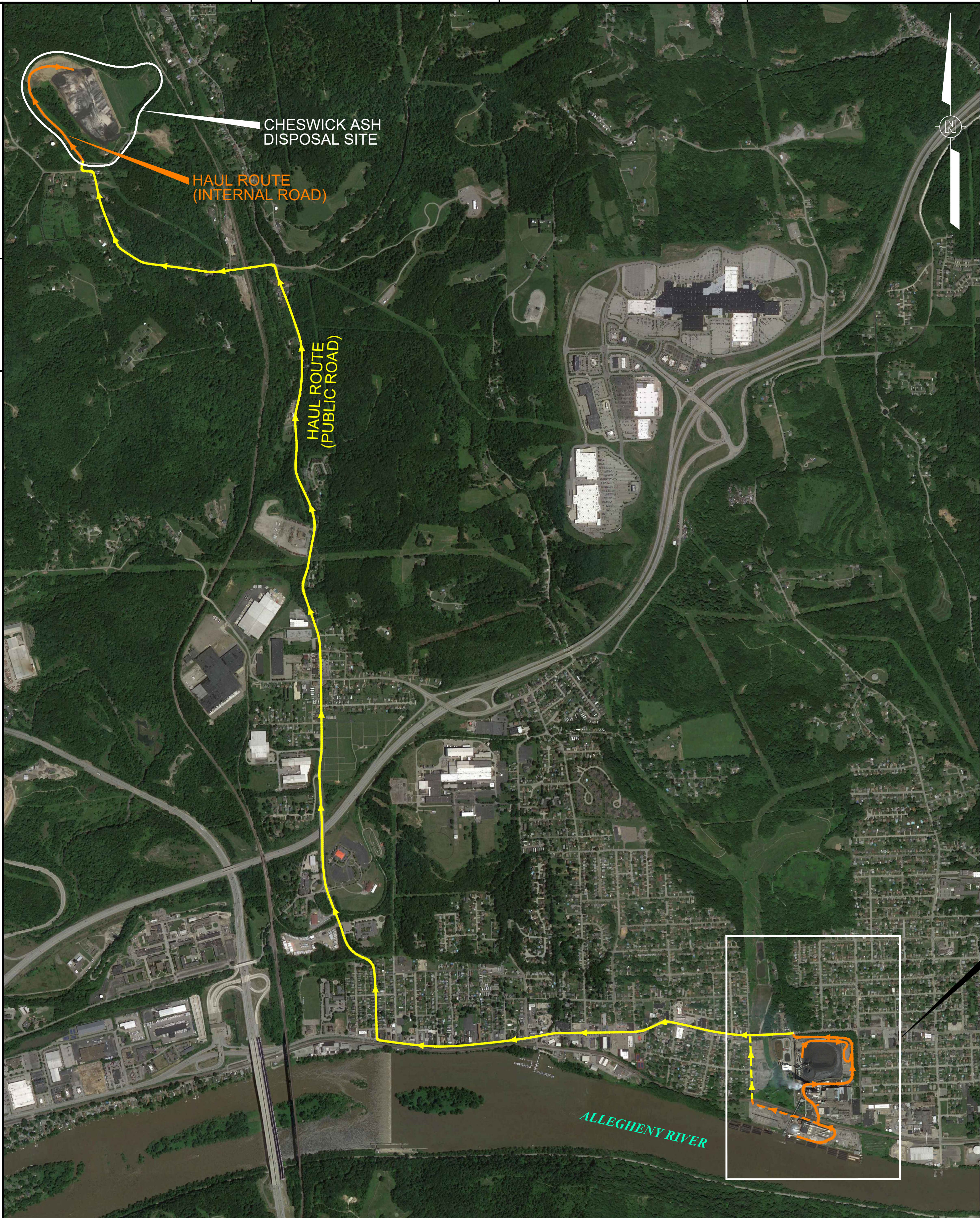


Figure

File: C:\Users\Evan.Schlegel\OneDrive - APTIM\Desktop\WORK FROM HOME\Cheswick\631025205-D1.dwg Xref: plot Date: 10/10/2022 3:21pm Plotted By: Evan.Schlegel

VERIFY SCALE
0 1"

OFFICE
Pittsburgh, PA
DRAWING NUMBER
631025205-D1



OVERALL VIEW

SCALE
0 1000 2000 4000 FEET



CHESWICK GENERATING STATION PROPER

ENLARGED SITE PLAN

SCALE
0 300 600 900 FEET

NOTES:

- CHESWICK GENERATING STATION CEASED OPERATIONS ON APRIL 1, 2022.
- HAUL ROUTES MAINTAINED FOR TRANSPORT OF CCR MATERIALS INCIDENTALLY GENERATED FROM DECOMMISSIONING AND DEMOLITION ACTIVITIES.

REV	DESCRIPTION / ISSUE	DATE	APPROVED
A	ADDED REMOTE DRAG CHAIN SYSTEM FOR BOTTOM ASH HANDLING	2/28/17	LCL
B	NOTED CLOSURE OF BOTTOM ASH PONDS	11/5/21	DJS
C	UPDATED TO REFLECT CESSATION OF OPERATIONS	11/10/22	DJS



500 Penn Center Boulevard,
Suite 1000
Pittsburgh, Pennsylvania 15235

DESIGNED BY: DJS	CHESWICK GENERATING STATION		
DRAWN BY: ELS	FIGURE 1 SITE LAYOUT AND POTENTIAL CCR FUGITIVE DUST SOURCES CHESWICK GENERATING STATION SPRINGDALE, ALLEGHENY COUNTY, PENNSYLVANIA		
CHECKED BY: DJS			
APPROVED BY: DJS	DATE: 11/10/22	SCALE: AS SHOWN	DRAWING NO. 631025205-D1
			SHEET NO. --

Attachment A

Recordkeeping Logs

RCW 5.4-1

GYPSUM HANDLING WEEKLY RECORDKEEPING ⁽¹⁾THIS FORM IS TO BE COMPLETED WEEKLY

Name:	Employee ID:
Date:	Time:
Visual Inspection of the Gypsum Handling System	
<ul style="list-style-type: none"> Is any dust being emitted from the equipment (conveyors, dome) to the outside air? In operation: Yes <input type="checkbox"/>	Circle One: Yes / No / NA If yes, identify the equipment and corrective actions taken. <hr/> <hr/>
<ul style="list-style-type: none"> Inspect transfer equipment (belts and rollers). Is the equipment in proper working order? In operation: Yes <input type="checkbox"/>	Circle One: Yes / No / NA If no, identify the equipment and corrective actions taken. <hr/> <hr/>
Was Dust Suppressant Applied to Pile (including the off-spec pile)?	Yes / No / NA Name of Material: <hr/> Dilution Ratio: _____ : _____ *Attach Purchase Record of chemical applied

⁽¹⁾ Refer to Section 5.4 of the Cheswick Station Dust Management Plan for additional information on recordkeeping and compliance related to this form. A photograph of each area to be observed is included in Appendix F of the Plan.

Comments: _____

Return Form Each Week to Environmental Department

Rev. 4
May 2015

ASH HANDLING, PROCESSING, AND STORAGE WATER USAGE RECORDKEEPING

Please record the time and date in which a water suppression system is turned on and off.

[illegible]

Return Form Each Month (or when all lines completed) to Environmental Department

RCW 5.10 -1

ASH HANDLING, PROCESSING AND STORAGE
WEEKLY RECORDKEEPING**THIS FORM IS TO BE COMPLETED WEEKLY**

Observer:		Date:	
Time:			
<ul style="list-style-type: none"> Fly Ash Silo Dust Collector Vents (baghouses) <p>In operation: Yes <input type="checkbox"/></p>	<p>Any emissions observed? Yes / No / NA</p> <p>If yes, did emissions extend beyond the property line? Yes / No / NA</p> <p>If yes, what action was taken?</p>		
<ul style="list-style-type: none"> Fly Ash Silo Load-out <p>In operation: Yes <input type="checkbox"/></p>	<p>Any emissions observed? Yes / No / NA</p> <p>If yes, did emissions extend beyond the property line? Yes / No / NA</p> <p>If yes, what action was taken?</p>		
<ul style="list-style-type: none"> Bottom Ash Bunker Loading, Bunker Storage, Truck Loading <p>In operation: Yes <input type="checkbox"/></p>	<p>Any emissions observed? Yes / No / NA</p> <p>If yes, did emissions extend beyond the property line? Yes / No / NA</p> <p>If yes, what action was taken?</p>		
<ul style="list-style-type: none"> Fly Ash Unloader (silo) <p>In operation: Yes <input type="checkbox"/></p>	<p>Is Ash uniformly wet? Yes / No / NA</p> <p>Is ash flow unimpeded? Yes / No / NA</p> <p>If no, what action was taken?</p>		

Comments: _____

Return Form Each Week to Environmental Department

Daily Operations Checklist

Date:

Weather:

SITE OPERATIONS

1. Material Disposed of:
 - a. Gypsum ☐
 - b. Fly Ash ☐
 - c. Bottom Ash ☐
 - d. Mine Sludge ☐
2. Attach map of waste placement locations ☐
3. Problems at Waste Pick-up Area? Yes ☐ No ☐
4. Problems with Waste Handling? Yes ☐ No ☐
5. Record spills on Road – Check if None ☐
 - a. Time –
 - b. Drive –
 - c. What Happened? –
6. Site Security
 - a. Front Gate Locked? Yes ☐ No ☐
 - b. Pond Locked? Yes ☐ No ☐
7. Dust Control Activities
 - a. Paved Roads:
 - i. Sweeping or Watering – Time Start and Stop _____
 - ii. Note any road maintenance _____
 - iii. Note reasons for suspending dust control ops _____
 - b. Unpaved Roads:
 - i. Treatment or Watering – Time start and stop _____
 - ii. Note Locations _____
 - iii. Note type of dust suppressant _____
8. Check Leachate
 - a. Flowing Freely? Yes ☐ No ☐
 - b. Unusual conditions? Yes ☐ No ☐
9. Fuel Tank Containment Dry? Yes ☐ No ☐
10. Check Truck Wash
 - a. Sump ☐
11. Was clearing and grubbing performed? Yes ☐ No ☐
12. Was Soil Stockpiled Today? Yes ☐ No ☐
 - a. Where? Attach Map ☐

- b. How much? _____
- c. # of Nutrient Samples
- d. #of USDA Class Samples
- e. #of Particle Size Samples
- f. #of LOI Samples

13. Was Base System Subgrade Prepared? Yes ☐ No ☐

- a. Where? Attach Map ☐
- b. Who inspected for Seeps?
- c. Who performed compaction tests?
- d. Who checked final surface?
- e. Attach Inspection Report?

14. Wash Bottom Ash Placed? Yes ☐ No ☐

- a. Where? Attach Map
- b. Who checked depth/
- c. Attach Inspection report

15. Is Final cover placement scheduled for this week? Yes ☐ No ☐

16. Berm Placed today? Yes ☐ No ☐

17. Is Seeding Scheduled for this Week? Yes ☐ No ☐

18. Was Seeding Performed? Yes ☐ No ☐

19. Was silt fence placed? Yes ☐ No ☐

NOTES:

R&L Site Representative _____ Date