

# CCR Fugitive Dust Control Plan

for

## Brayton Point Power Station

*Prepared for:*



# DYNEGY

Brayton Point Power Station  
1 Brayton Point Power Road  
Somerset, MA 02725

*Prepared by:*

# AECOM

October 2015

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# 1 Introduction

This Coal Combustion Residuals (CCR) fugitive dust control plan has been prepared for the Brayton Point Power Station, located in Bristol County, Massachusetts. This plan addresses the 40 CFR 257.80 air operating criteria of the United States Environmental Protection Agency's CCR rule, which requires the owner or operator of a CCR unit to adopt measures that will effectively minimize CCR from becoming airborne at the facility and to prepare and operate in accordance with a CCR fugitive dust control plan.

## 1.1 Facility Information

- Facility Name: Brayton Point Power Station
- Facility Address: 1 Brayton Point Road, Somerset, MA 02725
- Owner/Operator: Brayton Point Energy, LLC

## 1.2 Certification

The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of 40 CFR 257.80.

I certify under penalty of law that, to the best of my knowledge, this plan meets the requirements of 40 CFR 257.80. This certification is based on my review of the document and conditions at the site and on my inquiry of the person or persons who managed the preparation of this document.

*Gary M. Garfield*

Printed Name of Qualified Professional Engineer

*G M Garfield 10-7-15*

Signature of Qualified Professional Engineer and Date

*35232 - Massachusetts*

Registration Number and State



## 2 CCR Fugitive Dust Control Measures and Appropriateness

CCR fugitive dust has the potential to become airborne at the facility during periods of CCR management in the CCR units, CCR handling and CCR transport. Areas at the facility that have the potential for airborne CCR fugitive dust are CCR surface impoundments, CCR handling equipment and CCR transport in trucks. This section identifies and describes the control measures selected and adopted by the facility to minimize CCR from becoming airborne at the facility and explains how the selected measures are applicable and appropriate for site conditions. The control measures may be adjusted or modified based on observed effectiveness of minimizing CCR from becoming airborne and weather conditions.

### 2.1 Management of CCR in the CCR Units

The facility manages CCR in surface impoundments located at the facility. Table 2-1 below identifies CCR fugitive dust control measures that have been selected for use by the facility during CCR management in the CCR units, including placement of CCR into the CCR unit, and explains how the selected measures are applicable and appropriate for site conditions. The facility may use the identified measures during CCR management in the CCR units to minimize CCR from becoming airborne at the facility.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
Management of CCR in the facility's CCR units	Water areas of exposed CCR in CCR units, as necessary.	Water, to maintain moisture content, and/or dust control chemicals will be applied to areas of exposed CCR to minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions.
	Naturally occurring grass vegetation in areas of exposed CCR in CCR surface impoundments.	Vegetation provides a wind screen and/or cover and reduces wind entrainment of CCR.
	Wet management of bottom ash CCR in CCR units	Managing bottom ash wet in the impoundment minimizes fugitive dust while the ash is in the impoundment.

Table 2-1. Control Measures for CCR Management in CCR Units

## 2.2 Handling of CCR

CCR is regularly removed from the boiler system and conveyed to the CCR handling system, which includes silos and truck loading areas. CCR fly ash is pneumatically conveyed in an enclosed system from the boiler system to storage silos. When unloading the CCR fly ash silos for transport to the onsite CCR placement area or off-site third-party landfill, CCR fly ash is loaded into covered trucks using a telescoping loading chute in an partially enclosed loading bay. CCR bottom ash from the boilers is wet sluiced and pumped as a wet slurry into hydrobins for solids removal and then loaded wet into trucks below the hydrobins for transport on and off-site. The sluice water enters CCR units for additional settling of CCR prior to the water being reused in the bottom ash system. The bottom ash that accumulates in the CCR units is periodically removed and remains sufficiently wet, either by applying additional water or dust control chemicals, during and after handling activities, including dewatering, associated with transfer of the CCR. CCR dry scrubber material (DSM) is pneumatically transferred to DSM storage silos. DSM is loaded onto trucks using a loading chute in a partially enclosed loading bay. DSM can also be stored in covered dumpsters until transported for disposal. Table 2-2 below identifies CCR fugitive dust control measures that have been selected for use by the facility during handling of CCR and explains how the selected measures are applicable and appropriate for site conditions. The facility may use the identified measures when handling CCR to minimize CCR from becoming airborne at the facility.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
Handling of CCR at the facility	CCR materials to be emplaced in an off-site third party landfill or onsite placement area are conditioned with water before loading into trucks that are covered for transport.	Conditioning allows CCR to bind together and thus minimizes the potential for CCR fugitive dust generation while loading CCR into trucks (and during transport and emplacement).
	Wet sluice CCR bottom ash to CCR hydrobins.	Wet sluicing CCR bottom ash minimizes the potential for CCR fugitive dust generation during transport.
	Wet sluice residual CCR bottom ash from hydrobins to CCR units.	Wet sluicing residual CCR bottom ash minimizes the potential for CCR fugitive dust generation during handling.
	Pneumatically convey dry CCR fly ash to storage silos, storage dome, and Ash Reduction Process System in an enclosed system.	Conveying CCR fly ash in an enclosed system minimizes the potential for CCR fugitive dust generation.
	Pneumatically convey dry CCR scrubber material to storage silos in an enclosed system.	Conveying CCR scrubber material in an enclosed system minimizes the potential for CCR fugitive dust generation.
	Load CCR transport trucks from the CCR fly ash silos in a partially enclosed area. Close bay doors, as necessary.	Partial enclosure of the CCR transport truck loading area reduces the potential for wind to cause CCR fugitive dust to become airborne.
	Load CCR transport trucks from the CCR fly ash silos using a telescoping chute.	Use of a telescoping chute reduces the drop height from the end of the chute into the truck and minimizes the potential for CCR fugitive dust to become airborne.
	Load CCR transport trucks from the CCR fly ash storage dome in loading building. Close bay doors, as necessary.	Full enclosure of the CCR transport truck loading area minimizes the potential for wind to cause CCR fugitive dust to become airborne.
	Load CCR transport trucks from the CCR scrubber material silos in an enclosed area.	Enclosure of the CCR transport truck loading area reduces the potential for wind to cause CCR fugitive dust to become airborne.
	Load wet bottom ash into CCR transport trucks from the CCR bottom ash hydrobins.	Wetting allows CCR to bind together and thus minimizes the potential for CCR fugitive dust generation while loading CCR into trucks
	Perform housekeeping, as necessary, in the CCR ash and CCR scrubber material loading areas.	Good housekeeping measures, such as sweeping or wetting the loading area, minimizes the potential for CCR fugitive dust generation during handling.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
	Operate CCR fly ash and CCR scrubber material handling systems in accordance with good operating practices.	Operation in accordance with good operating practices minimizes the potential for CCR fugitive dust generation.
	Inspect, maintain and repair as necessary dust controls on the fly ash and CCR scrubber material handling system.	Maintenance and repairs are performed as needed to maintain dust controls in good operating condition to minimize the potential for CCR fugitive dust generation.

**Table 2-2. Control Measures for Handling CCR**

## 2.3 Transportation of CCR

CCR is transported via truck at the facility using a combination of paved and unpaved facility roads. Table 2-3 below identifies CCR fugitive dust control measures that have been selected for use by the facility during transport of CCR. The facility may use the identified measures when transporting CCR to minimize CCR from becoming airborne at the facility.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
Transportation of CCR at the facility	CCR to be emplaced onsite or off-site is conditioned before loaded into vehicles for transport.	Conditioning CCR increases moisture content of the CCR and minimizes the potential for CCR fugitive dust generation during CCR transport (and emplacement in the landfill).
	Cover or enclose trucks used to transport CCR fly ash, CCR bottom ash and CCR DSM.	Covering or enclosing trucks transporting CCR on facility roads minimizes the potential for CCR fugitive dust generation from the CCR transport trucks.
	Limit the speed of vehicles to no more than 15 mph on facility roads.	Limiting the speed of vehicles traveling on facility roads minimizes the potential for CCR fugitive dust generation from the CCR transport trucks.
	Rinse off the outside of the trucks transporting CCR prior to leaving the property, as necessary.	Removing CCR present on the outside of the truck minimizes the potential for movement of the truck or wind to cause CCR fugitive dust to become airborne.
	Use a street sweeper to remove CCR, as necessary, deposited on paved facility road surfaces during transport.	Removing CCR deposited on facility road surfaces as a result of transport minimizes the potential for CCR fugitive dust generation from vehicle traffic.
	Apply chemical dust suppressant to CCR haul roads and to exposed CCR, as necessary.	Mixing an appropriate chemical dust suppressant with water and applying to CCR haul roads and exposed CCR will minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions.

Table 2-3. Control Measures for Transportation of CCR

### 3 Procedures for Periodic Assessment of the Plan

The facility conducts inspections associated with CCR fugitive dust control. The facility also uses the procedures identified in section 5 of this plan to log citizen complaints involving CCR fugitive dust events at the facility. These inspections and the investigations of citizen complaints will be used to periodically assess the effectiveness of the CCR fugitive dust control plan.

The facility routinely performs inspections to verify the effectiveness of the CCR fugitive dust control measures used at the facility. Inspections are conducted during daylight working hours and include observing for the presence of CCR fugitive dust emissions from vehicles transporting CCR on facility roads, CCR handling and CCR management, including CCR placement in CCR units. Inspection records include information such as the name of the person conducting the inspections, the date and time of the inspection, the results of each inspection, and any corrective action taken.

When a CCR fugitive dust event is observed or a citizen complaint involving a CCR fugitive dust event at the facility is received, current CCR management practices will be reviewed to see that the selected control measures are being properly implemented. If the control measures are not being properly implemented, relevant operating personnel will be notified and, as warranted, re-trained in the proper implementation of CCR fugitive dust control measures. If appropriate, use of revised and/or additional control measures will be evaluated. As warranted, revised and/or additional control measures found to be applicable and appropriate to control CCR fugitive dust emissions will be incorporated into an amended CCR fugitive dust control plan.

The plan also will be reassessed in the event of material changes in site conditions potentially resulting in CCR fugitive dust becoming airborne at the facility.



## 4 Recordkeeping, Notification, Internet Site

The written CCR fugitive dust control plan, any amendment of the written plan, and the annual CCR fugitive dust control report required by 40 CFR 257.80(c) will be placed in the facility's written operating record and posted to the Internet site in accordance with 40 CFR 257.105(g) and 257.107(g). Notification of the availability of the CCR fugitive dust control plan, any amendment of the plan, and the annual CCR fugitive dust control report will be provided to the State Director in accordance with 40 CFR 257.106(g).

## 5 Procedures to Log Citizen Complaints

In the event the owner or operator of the facility receives a citizen complaint involving a CCR fugitive dust event at the facility, relevant information about the complaint will be logged. Information that will be recorded includes, as applicable:

- Date/Time the complaint is received
- Date/Time and duration of the CCR fugitive dust event
- Description of the nature of the CCR fugitive dust event
- Name of the citizen entering the complaint
- Address & phone number of citizen entering the complaint
- Name of the personnel who took the complaint

All citizen complaints involving CCR fugitive dust events at the facility will be investigated promptly. As deemed appropriate or necessary, corrective measures will be taken and a follow-up response will be provided to the complainant.

## 6 Regulatory Cross Reference

40 CFR 257 Citation	Regulatory Requirement	CCR Fugitive Dust Control Plan Section
.80(b)(1)	Identify and describe CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. Explanation of how the CCR fugitive dust control measures selected are applicable and appropriate for site conditions	2
.80(b)(3)	Procedures to log citizen complaints involving CCR fugitive dust events at the facility	5
.80(b)(4)	Periodic assessment of effectiveness of CCR Fugitive Dust Control Plan	3
.80(b)(5)	Date of initial CCR Fugitive Dust Control Plan	7
.80(b)(6)	Amendment of CCR Fugitive Dust Control Plan	7
.80(b)(7)	Certification of CCR Fugitive Dust Control Plan	1.2

**Table 6-1. CCR Fugitive Dust Control Plan Regulatory Cross Reference**

## 7 Amendments

The written CCR fugitive dust control plan may be amended at any time provided the revised plan is placed in the facility's operating record as required by 40 CFR 257.105(g)(1). The written CCR fugitive dust control plan must be amended whenever there is a change in conditions that would substantially affect the written plan in effect.

Amendment Number and Date	Pages or Section	Description of Amendment	Professional Engineer Certifying Plan
Version 0 October 2015	--	Initial Plan	Gary M. Garfield

Table 7-1. CCR Fugitive Dust Control Plan Amendments