CCR FUGITIVE DUST CONTROL PLAN

FORMER BIG BROWN STEAM ELECTRIC STATION

January 2020

As required by 40 Code of Federal Regulations (CFR) §257.80, this plan identifies and describes the control measures that the former Big Brown Steam Electric Station (BBSES) will use to minimize fugitive dust emissions from the following Coal Combustion Residual (CCR) units:

Description	CCR Type
North Bottom Ash Pond	Surface impoundment
South Bottom Ash Pond	Surface impoundment
Ash Disposal Area 2 Landfill	Landfill

Big Brown will use combinations of the following dust control measure(s):

1. Water spray or fogging system
2. Reduction in fall distance
3. Vegetative cover
4. Reduced vehicle speed limits
5. Application of daily cover

Discussion of Dust Control Measures – 40CFR § 63.257.80(b)(1)

BBSES ceased power generation in 2018 and has three CCR units onsite. The BBSES is currently owned by Falcon Development, LLC and the CCR units are in the process of closure. The two impoundments primarily contain bottom ash fines that have settled out from the sluiced water coming from the plants dewatering bins. Material is only stored wet and there is virtually no possibility for fugitive dust to be generated. No specific dust controls are necessary for these CCR units. In 2020, the bottom ash will be dewatered and removed from these units and hauled to the Ash Disposal Area 2 Landfill. The material will be moist, therefore, minimal dust generation.

The Ash Disposal Area 2 Landfill does have the potential for fugitive dust, but most likely not CCR material. The Ash Disposal Area 2 Landfill is registered to receive fly ash and bottom ash. The landfill is no longer receiving fly ash. Bottom ash has inherently high moisture contents, additional water or chemical conditioning is not needed.

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All plant roads are watered as necessary to prevent dusting. Additionally, vehicle speeds are limited to reduced speeds throughout the plant. These practices sufficiently minimize all fugitive dust. Any additional watering for the landfill and all other areas will be performed, as necessary.

Procedures to Emplace CCR as conditioned CCR- 40 CFR §63.257.80(b)(2)

As discussed above, the plant ceased operation and no longer generates, or transports fly ash.

Procedures to Log Citizen Complaints - 40 CFR §63.257.80(b)(3)

See Attachment 1 for procedures.

Procedures to Assess Effectiveness of the Control Plan - 40 CFR §63.257(b)(5)

See Attachment 2 for procedures.

Completion of Initial CCR Fugitive Dust Control Plan - 40 CFR §63

The initial CCR fugitive dust control plan was completed in 2015 and placed in the operating record on 10/16/15.

Amendment of the Plan - 40 CFR §63.257.80(b)(6)

The plan will be amended as necessary to account for conditions that would substantially affect the plan currently in effect. The revised plan will be placed in the facility's operating record.

Professional Engineer Certification - 40 CFR §63.257.80(b)(7)

This fugitive dust control plan has been certified by a registered Professional Engineer to meet the requirements of this section. See Attachment 3. Any subsequent amendments of this plan must also be certified by a registered Professional Engineer.

ATTACHMENT 1

Citizen complaints may be received through a variety of ways. Common methods would be through (1) a complaint submitted to the Texas Commission on Environmental Quality, (2) an in-person complaint, likely received by the guards at the front gate, or 3) call to the Falcon Development.

For complaints submitted to the TCEQ, all available information will be entered into the following form.

If a phone call or in-person complaint is made, the complainant should be directed to the onsite remediation supervisor (FB Remediation) who in turn will notify Falcon Development. The following form should be completed for each complaint received.

For each complaint, operational data and other pertinent information shou be collected and evaluated. If necessary, corrective actions should be determined and the dust mitigation plan should be revised. All corrective actions, if necessary, should be documented. All other pertinent information should also be documented.

Citizen Complaint Log
CCR Dust Control Plan - BBSES

Complainant Name	
Complainant Address	
Complainant number or e-mail	
How was the complaint received?	
Date/Time of Event	
Date of complaint	
Description of event	
Impact of event	
Location and/or source of event	
Evidence of event	
Name of person who received complaint	
Name and date of person contacted at Falcon	

ATTACHMENT 2

Procedure to Assess Effectiveness of the Control Plan

In association with the preparation of the annual CCR fugitive dust control report required under 40 CFR §63.B0(c), review this entire document and determine if the plan is still effective at minimizing fugitive CCR dust. Additionally, this review can be completed, and the control plan amended at any time.

The following specific items should be evaluated:

- Any complaints received in the past year,
- Any operational issues raised, and
- Any alternate control strategies suggested by operational personnel.

ATTACHMENT 3

The preceding Fugitive Dust Control Plan for the former BBSES was prepared under my direction:

Adam J. Kaiser, P.E.
Texas PE No 126387, Expires 3/31/2020

1/7/2020