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GREDELL Engineering Resources, Inc.

**Fugitive Dust Control Plan
for
Sikeston Power Station**

Prepared for: _____

**Sikeston Board of Municipal Utilities
503 East Center Street
Sikeston, MO 63801**

October 19, 2015

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Fugitive Dust Control Plan
for
The Sikeston Board of Municipal Utilities
Sikeston Power Station
October 19, 2015

1.0 GENERAL

The purpose of this plan is to establish measures to control fugitive dust from coal combustion residuals (CCR) in accordance with the Code of Federal Regulations, Title 40 – Protection of Environment, Part 257 – Criteria for Classification of Solid Waste Disposal Facilities and Practices, Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments, Section 80 – Air criteria (40 CFR 257.80). The control measures described herein will minimize CCR particulates from becoming airborne within the Sikeston Power Station (the facility). Additional fugitive dust control measures may be employed, as needed, with future amendment of this plan.

In accordance with 257.105(g)(1) (Recordkeeping Requirements), this Fugitive Dust Control Plan (FDCP) or subsequent amended plan shall be placed and retained in the facility's on-site written operating record.

In accordance with 257.106(g)(1) (Notification Requirements), notifications of availability shall be sent to the Missouri State Director as defined under 257.53 (Definitions) when the FDCP has been placed in the on-site written operating record and when it has been placed on the facility's publicly accessible internet site. The notification shall be sent via electronic mail or postal service before the close of business on the day the notification is required. The first notification of availability of this FDCP in the on-site written operating record shall be sent November 18, 2015. A second notification shall be sent when this FDCP is placed on the publicly accessible internet site.

In accordance with 257.107(g)(1) (Publicly Accessible Internet Site Requirements), this FDCP or subsequent amended plan shall be posted to the facility's publicly accessible internet site within thirty (30) days of being placed in the on-site written operating record. The most current version of the FDCP shall be made available on the publicly accessible internet site.

In accordance with 257.80(c) (Annual CCR Fugitive Dust Control Report), an annual report shall be prepared that includes a description of the actions taken to control CCR fugitive dust, a record of all citizen complaints involving CCR fugitive dust events at the facility, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the initial FDCP in the on-site written operating record. Deadlines for subsequent reports are one year after the date of the previous report.

Annual Fugitive Dust Control Reports (FDCRs) shall be placed in the on-site written operating record and maintained for five (5) years in accordance with 257.105(g)(2). The annual FDCRs shall be posted to the publicly accessible internet site (within thirty (30) days of placing in the on-site written operating record) and made available for at least five (5) years in accordance with 257.107(g)(2). Notifications of availability shall be sent to the Missouri State Director when the annual FDCRs have been placed in the facility's on-site written operating record (within thirty (30) days) and posted to the publicly accessible internet site (generally within thirty (30) days), in accordance with 257.106(g)(2).

2.0 CCR FUGITIVE DUST CONTROL MEASURES

As per 257.80(b)(1), the following measures may be used to minimize CCR from becoming airborne at the facility on haul roads and in areas of exposed CCR within CCR unit(s). The control measures outlined in this FDCP are appropriate for the site conditions. The most appropriate measure for the facility may be contingent on available resources at the facility, therefore multiple options are presented.

2.1 Haul Road - Control Measure Options

The following control measure options are listed in order of most appropriate for the known site conditions within the facility.

2.1.1 Documented Watering

- The facility will control CCR fugitive dust as necessary during periods of visible emissions from all unpaved portions of the haul roads used for the transportation of CCR by using the application of a water spray. Water spray application shall be sufficient to achieve control of CCR fugitive dust while the facility is in operation.
- The facility shall maintain a log that documents each water application, including the date and the approximate volume of water applied.
- The facility log should also maintain record of when watering operations are deemed unnecessary due to inclement weather conditions (e.g. rainfall in excess of one-quarter inch, snow, or sleet), when there is no heavy equipment traffic on the haul roads, the ground is frozen, or during periods of freezing conditions when watering would be inadvisable for traffic safety reasons.

2.1.2 Chemical Dust Suppressant

- The facility may elect to apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to some or all unpaved portions of the haul roads used for the transportation of CCR. If used, the suppressant should be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive dust from the haul roads while the facility is in operation.
- If used, maintain a record of the date and the amount of material applied for each application of the chemical dust suppressant on the haul roads.

2.1.3 Pavement

- The facility currently has paved sections of haul roads used for the transportation of CCR with materials that provide an impervious, dust-resistant surface. If additional paving is used, the pavement should be applied in accordance with industry standards for such pavement so as to achieve control of CCR fugitive dust while the facility is in operation.
- Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of CCR fugitive dust from the haul roads while the facility is in operation.
- The facility will periodically water, wash and/or otherwise clean the paved portions of haul roads used for the transportation of CCR, as necessary, to achieve control of fugitive dust from these areas while the facility is in operation.

2.2 Exposed CCR within CCR Unit(s) - Control Measure Options

Exposed CCR within the northern CCR unit (fly ash pond) currently supports a dense stand of grass and is sufficiently vegetated to control fugitive dust. Exposed CCR within the southern CCR unit (bottom ash pond) is generally confined to the northwestern corner where active filling operations are taking place (the remainder of the impoundment is generally below water level at normal pool elevations). The following control measure options are listed in order of most appropriate for the existing site conditions at this facility.

2.2.1 Documented Watering

- The facility will control CCR fugitive dust from exposed CCR within the southern CCR unit by application of a water spray via truck-mounted water cannon (or similar). Water spray will be applied as necessary to achieve control of CCR fugitive dust while the facility is in operation.
- The facility may maintain a log of water application. This log will include date and volumes (e.g., number of applications and/or total gallons used) of water application.
- The facility log should also maintain record of when watering operations are deemed unnecessary due to inclement weather conditions (e.g. rainfall in excess of one-quarter inch, snow, or sleet), the ground is frozen, or during periods of freezing conditions when watering would be inadvisable for traffic safety reasons.

2.2.2 Vegetative Cover

- The facility may elect to apply a temporary cover crop and/or heavy mulch for the purpose of establishing vegetative cover to control CCR fugitive dust from areas of exposed CCR while the facility is in operation.
- If used, the quantities of seed and/or mulch will be applied in accordance with standard agronomic practices, re-applied as needed, and/or maintained to

achieve sufficient control of CCR fugitive dust from areas of exposed CCR while the facility is in operation.

- If used, maintain records of vegetative cover operations.

2.2.3 Chemical Dust Suppressant

- The facility may elect to apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to exposed CCR within the CCR unit(s). If used the suppressant should be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive dust while the facility is in operation.
- If used, maintain records of the date and the amount of material applied for each application of the chemical dust suppressant agent.

3.0 CCR Landfill

The facility does not currently own or operate a CCR landfill.

4.0 Citizen Complaint Log

As per 257.80(b)(3), the facility will maintain a log of citizen complaints involving CCR fugitive dust events at the facility.

5.0 Periodic Plan Assessment Procedures

As per 257.80(b)(4), the facility will assess the effectiveness of this FDCP with periodic CCR fugitive dust evaluations. These assessments will include a review of citizen complaints and/or visual monitoring for apparent CCR fugitive dust dispersal from the CCR haul roads and unit(s). Assessments will also include an evaluation of corrective measures implemented as a result of previous evaluations or citizen complaints. In the event that recurring deficiencies are noted during assessments, this FDCP will be amended.

6.0 Plan Amendments

This FDCP will be amended, as per 257.80(b)(6) whenever there is a change in conditions that would substantially affect this written FDCP in effect, such as the construction and operation of a new CCR unit. All amendments must be certified by a registered Professional Engineer.

7.0 Professional Engineer's Certification

I, Thomas R. Gredell, P.E., a professional engineer licensed in the State of Missouri, hereby certify in accordance with 40 CFR 257.80(b)(7) that this initial CCR Fugitive Dust Control Plan for the Sikeston Board of Municipal Utilities, Sikeston Power Station has been prepared in accordance with applicable federal requirements promulgated under 40 CFR 257, Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments and good engineering and environmental practices. More specifically, I hereby certify that the initial CCR fugitive dust control plan meets the requirements of 40 CFR 257.80.

Name: Thomas R. Gredell, P.E.

Signature: _____

Date: 10/19/15

Registration Number: PE-021137

State of Registration: Missouri

