

FUGITIVE DUST CONTROL PLAN CRISP COUNTY POWER COMMISSION

PLANT CRISP ASH POND AND SECONDARY ASH AREAS

Worth County, Georgia

Prepared for



Crisp County Power Commission

961 Power Dam Road
Warwick, GA 31796
(229) 535-6275

Prepared by

Geosyntec 
consultants

engineers | scientists | innovators

Georgia Certificate of Authorization
No. PEF000260, Exp. 06/30/2024

1255 Roberts Boulevard, Suite 200
Kennesaw, Georgia 30144
(678) 202-9500

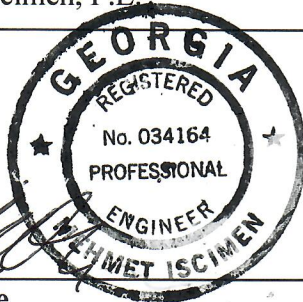
Revision 3 – August 2022

CERTIFICATION

I certify under penalty of law that the information contained within this Fugitive Dust Control Plan was prepared by me or under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I do hereby certify that in my professional opinion that the applicable requirements of Part 257.80 of the Federal Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule (40 CFR § 257) and Section (5).b of the Georgia Environmental Protection Division, Solid Waste Rule 391-3-4-.10 for Management of Coal Combustion Residuals have been met.

Mehmet Iscimen, P.E.

Name



Signature

PE034164

Georgia P.E. License Number

12 August 2022

Date

26 September 2016

Initial Publication Date

12 August 2022 (Revision 3)

Latest Revision

1.0 Overview and Purpose

Crisp County Power Commission (CCPC) Plant Crisp is a dual-fuel (coal and natural gas) electrical generation facility located in Worth County, Georgia. The byproducts of power generation through the combustion of coal (commonly referred to as Coal Combustion Residuals or CCR) at Plant Crisp included mainly fly ash and bottom ash. The CCR were disposed into an ash pond located within the plant property using wet sluicing method. Additionally, two additional areas were identified as receiving CCR from the early stages of Plant operations prior to construction of the ash pond - Secondary Ash Area 1, an area northwest of the ash pond, and Secondary Ash Area 2, an area south of the ash pond. The coal burning and resulting ash disposal was conducted until August 2015. The coal burn unit was briefly re-activated in December 2016 to eliminate an existing small coal supply. The last burning of coal took place on March 22, 2017.

In general, once the CCR is exposed in the ash pond or other areas, environmental factors can lead to CCR losing their moisture content and creating fugitive dust or “solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than through a stack or chimney,” as defined by the Environmental Protection Agency. The purpose of this fugitive dust control plan is to minimize fugitive dust at the ash pond and secondary ash areas, which will be closed by removal, and demonstrate compliance with 40 C.F.R. § 257 (US Environmental Protection Agency CCR Rule) and Georgia Environmental Protection Division, Solid Waste Rule 391-3-4-.10 (GA EPD CCR Rule).

2.0 Fugitive Dust Control Measures

The following fugitive dust control measures will be implemented to minimize the CCR from becoming airborne at Plant Crisp:

- Access to the ash pond and secondary ash areas will be restricted with signage, allowing only necessary personnel to conduct ash management, inspections, and closure activities. This will minimize the disturbance of unpaved access roads and exposed ash areas and will limit potential sources of fugitive dust.

- Ash will be handled moist or wet during movement and placement. Ash is no longer handled or generated as part of any current Plant operations. The only handling of ash at the Site will be as part of the Closure by Removal efforts for the ash pond and secondary ash areas.
- Areas with observed fugitive dust will be sprayed with water using an industrial sprinkler system, water truck, or other means approved by plant personnel.
- Vehicle access will not be allowed inside the ash pond and secondary ash areas other than during closure site investigations and construction activities. During these activities, vehicle speed will be limited. A speed limit sign will be posted at each access road entrance to the ash pond and secondary ash areas, as needed.
- Contractors involved with moving or disturbing CCR will follow dust control measures approved by plant personnel.
- Portions of the ash pond that are above the water level, as well as the secondary ash areas, are covered with natural vegetation that controls erosion and minimizes dust.
- Constructed ash pond dikes act as wind breaks.
- Routine inspections by plant personnel for fugitive dust will be completed.

Selection of the fugitive dust controls were made on a site-specific basis for Plant Crisp. As the ash pond and secondary ash areas have not received ash since March 2017, the most important dust control measures at Plant Crisp include: (i) limit access into the ash pond and secondary ash areas and only allow necessary actions such as closure investigations; (ii) inspect the ash pond and secondary ash areas routinely and maintain exposed CCR in the ash pond and secondary ash areas damp by watering as necessary; and (iii) maintain existing vegetation in the secondary ash areas and existing vegetation grown over ponded CCR and surrounding dikes in the ash pond to the extent practical. Rainwater and periodic watering as necessary will form a heavier, moist layer of CCR on the surface and inhibit CCR from becoming airborne. The naturally established vegetation on ponded ash will provide enclosure and the root system will hold ash particles together. Plant personnel will routinely inspect the ash pond and secondary ash areas to determine frequency of watering that is required to keep CCR damp.

3.0 Citizen Complaints

Citizens may submit complaints or concerns about fugitive dust issues to Plant Crisp personnel by calling Crisp County Power Commission at (229) 273-3811. When complaints are received, they will be investigated promptly and appropriate actions to resolve the issue will be completed. All complaints and resulting actions will be documented and kept on file at Plant Crisp.

4.0 Annual Inspections

Fugitive dust control inspections at the ash pond and secondary ash areas will be conducted annually and documented by Plant Crisp personnel. Effectiveness of fugitive dust control measures will be assessed during inspection. At the time of inspection, the fugitive dust control plan and list of citizen complaints will also be reviewed to determine if any revisions to the plan are required. If Plant Crisp personnel determine revisions are required, they will review their concerns with a licensed Professional Engineer.

An annual Fugitive Dust Control Report will be issued every year which will include:

- Plant name and owner/operator of the facility;
- Reporting timeframe;
- Purpose;
- Actions taken to control fugitive dust;
- Log of citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility, if any; and
- Summary of any corrective measures taken.

An Annual Fugitive Dust Control Report template can be found in Appendix A.

APPENDIX A

Annual Fugitive Dust Control Report Template

**Coal Combustion Residuals (CCR)
Annual Fugitive Dust Control Report**

PLANT NAME: Plant Crisp

OWNER/OPERATOR OF FACILITY: Crisp County Power Commission

REPORTING TIMEFRAME:

PURPOSE:

DESCRIBE THE ACTIONS TAKEN TO CONTROL FUGITIVE DUST:

CCR FUGITIVE DUST CITIZEN COMPLAINTS WITHIN THE REPORTING TIMEFRAME

Date	Description of Complaint	Corrective Measures (If Any)