

FUGITIVE DUST CONTROL PLAN
CRISP COUNTY POWER COMMISSION
PLANT CRISP ASH POND
Worth County, Georgia

Prepared for



Crisp County Power Commission

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CERTIFICATION

I certify that the information contained within this Fugitive Dust Control Plan was prepared by me or under my direct supervision, and meets the requirements of Section §257.80 of the Federal Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities; Final Rule (40 CFR 257; the CCR rule) and the Georgia EPD Air Quality (391-3-1) and Solid Waste Management (391-3-4) regulations. For purposes of this document, “certify” and “certification” shall be interpreted and construed to be a “statement of professional opinion.” The certification is understood and intended to be an expression of my professional opinion as a Georgia Licensed Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the closure activities.

Mehmet Iscimen, P.E., CPESC

Name

Signature

PE034164

Georgia P.E. License Number

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Date

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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 CCRs) at Plant Crisp included mainly fly ash and bottom ash. The CCRs were disposed into an ash pond located within the plant property using wet sluicing method. The last coal burning and resulting sluicing operation was conducted in August 2015. The coal burn unit may be briefly re-activated for testing or to use up the remaining, low volume coal in the facility.

In general, once the CCRs are placed in the ash pond, environmental factors and evaporation of the water in the pond can lead to CCRs 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 Plant Crisp and demonstrate compliance with USEPA 40 CFR 257.80.

2.0 Fugitive Dust Control Measures

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

- Access to the inactive CCR unit 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.
- Areas with observed fugitive dust will be sprayed with water using an industrial sprinkler system, water truck, or other means approved by plant personnel. If the sprinkler system is used, the water will be provided from the existing water line located at the CCPC facility approximately 350 feet from the ash pond.

- Vehicle access will not be allowed inside the ash pond other than during ash pond closure site investigation 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 CCR unit.
- Contractors involved with moving or disturbing CCRs will follow dust control measures approved by plant personnel.
- Portions of the pond that are above the water level 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 pond is currently inactive and expected to be mainly inactive until closure, the most important dust control measures at Plant Crisp include: (i) limit access into the ash pond and only allow necessary actions such as pond closure investigations; (ii) inspect pond routinely and maintain CCRs in the pond damp by watering as necessary; and (iii) maintain existing vegetation grown over ponded CCRs and surrounding dikes. Rainwater and periodic watering as necessary will form a heavier, moist layer of CCR on the surface and inhibit CCRs 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 to determine frequency of watering that is required to keep CCRs 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) 535-6275. 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 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.