

**CCR Fugitive Dust Control Plan  
Curtis H. Stanton Energy Center  
Orange County, Florida**

The Orlando Utility Commission (OUC) operates the Curtis H. Stanton Energy Center which is subject to the requirements of 40 CFR Part 257, Hazardous And Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities. The requirements for a coal combustion residuals (CCR) fugitive dust control plan are set forth in § 257.80. This CCR fugitive dust control plan follows the requirements a set forth in the rule.

**§ 257.80 Air criteria.**

(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

(b) CCR fugitive dust control plan. The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (b)(7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

**Fugitive Dust Control Measures:**

**A) Water Applications and Sweeping Operations**

*OUC hires an on-site contractor to perform coal combustion residue (CCR) operations. The contractor will have an individual employee perform visible emission observations. Based on the experience of the observer, when visible emissions are observed, the observer will use this indicator to determine if there is a need to apply water as a dust suppressant or to remove material from paved roadways with a sweeper. Water may be applied with a water spray truck in the landfill when work activities are causing a disturbance of the erodible surface and on all roadways during operational activities. Sweeping operations may be performed on the paved haul roads whenever CCR materials build-up on the paved haul roads.*

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*The on-site contractor will keep a daily log to show the following:*

- i) when and what observations are made*
- ii) when water is applied to the landfill*
- iii) when the roadways are sprayed with water*
- iv) when the roadways are swept*
- v) reasons the above control measures are not implemented, e.g., during a precipitation event.*

*These dust control measures will be performed until areas are observed to be sufficiently free of fugitive emissions, i.e., until observations for visible emissions do not indicate the need to apply additional fugitive dust control measures.*

**B) Vehicular and Equipment Speed Limits**

*A 15 mile per hour (mph) speed limit is posted within the plant facilities and enforced by OUC security personnel. Based on the observations of the contracted emissions observer, the speed limit for vehicular and heavy equipment travel within the plant facilities and on the haul roads may be reduced if necessary.*

*Time spent in non-paved areas by hauling vehicles is limited to only that necessary.*

**Justification:**

*“Water acts as a dust suppressant by forming cohesive moisture films among the discrete grains of surface material. In turn, the moisture level depends on the moisture added by natural precipitation, the moisture removed by evaporation, and moisture movement beneath the surface. The evaporation rate depends on the degree of air movement over the surface, material texture and mineralogy, and the degree of compaction or crusting. The moisture-holding capacity of the air is also important, and it correlates strongly with the surface temperature. Vehicle traffic intensifies the drying process primarily by increasing air movement over the surface.”<sup>1</sup> “Following the wetting of a soil or other surface material, fine particles will move to form a surface crust. The surface crust acts to hold in soil moisture and resist erosion.” “Exposed soil that lacks a surface crust (e.g., a disturbed soil or a very sandy soil) is much more susceptible to wind erosion.”<sup>2</sup> Application of dust suppressants, in this case water, on disturbed areas are 80% efficient in controlling PM<sub>10</sub> emissions.<sup>3</sup>*

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<sup>1</sup> Western Regional Air Partnership (WRAP), September 2006. *Fugitive Dust Handbook*, pg. 1-5.

<sup>2</sup> Ibid., pg.1-6.

<sup>3</sup> Ibid., pg. 8-19

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(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.

*Fugitive Dust Control Measures:*

*All CCR materials undergo processing prior to placement in the landfill that results in a wetted product. If the material is too wet to pass a paint-filter test, it is placed in a decanting cell.*

(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

*The OUC Environmental Division will keep a log documenting all complaints from citizens regarding CCR fugitive dust events received by the OUC Marketing and Community Relations Division.*

(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

*The OUC Environmental Division will keep a log documenting all complaints from citizens regarding CCR fugitive dust events received by the OUC Marketing and Community Relations Division. The log will be reviewed on a monthly basis and used by OUC Environmental Division to evaluate the appropriateness of fugitive dust control measures and to modify those measures as needed.*

(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than **October 19, 2015**, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after **October 19, 2015**. The owner or operator has completed the initial CCR fugitive dust control plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(1).

*The Fugitive Dust Control Plan will be posted on OUC web site no later than October 19, 2015.*

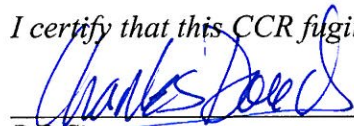
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(6) Amendment of the plan. The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by §257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

*OUC will amend the Fugitive Dust Control Plan if the planned operational controls are ineffective or there is a change at the facility that reduces the effectiveness of the current control operations.*

(7) 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 this section.

*I certify that this CCR fugitive dust control plans meets the requirements of 40 CFR 257.80.*

  
P.E. Signature

October 2<sup>nd</sup>, 2015  
Date

Mr. Charles Doud  
Printed Name

# 58596                      Florida  
Registration Number      State

