

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 1 of 10

**TABLE OF CONTENTS**

1	Introduction.....	2
1.1	Scope and Purpose .....	2
2	Fugitive Coal Dust Emissions Control Plan Requirements .....	2
2.1	Identify and Describe Control Measures.....	2
2.2	Conditioned CCR.....	3
2.3	Citizen Complaints.....	3
2.4	Effectiveness of the Dust Control Plan .....	4
2.5	Preparation of the Initial Fugitive Dust Control Plan .....	4
2.6	Plan Amendments .....	5
2.7	Professional Engineer Certification .....	5
3	Annual Report.....	5
4	Recordkeeping, Notification, and Internet Requirements.....	7
5	Citizen Complaint and Corrective Action Log .....	7
6	Professional Engineer Certification .....	8

**Appendix A: Citizen Complaint Log**

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 2 of 10

## **1 Introduction**

### **1.1 Scope and Purpose**

Colstrip Energy Limited Partnership disposes of boiler fly ash and bottom ash generated by the Rosebud Power Plant in an on-site ash landfill. The first ash disposal landfill was established at the site in 1990. This site was capped in place and reclaimed in 2006. The active ash disposal site was first established to the west of the Rosebud Power Plant in 2005 and remains in operation.

The Coal Combustion Residual (CCR) Rule was published in the *Federal Register* on April 17, 2015. The CCR Rule includes requirements for existing and new coal ash landfills and surface impoundments. CELP has an existing CCR landfill and is subject to a variety of requirements, including a Fugitive Dust Control Plan. This document fulfills the requirements of the fugitive dust control plan prescribed in 40 CFR Part §257.80 Air Criteria.

## **2 Fugitive Coal Dust Emissions Control Plan Requirements**

The Fugitive Dust Control Plan Requirements are included in §257.80(b)(1) through (7). The requirements of the plan will be addressed in the subsequent sections.

### **2.1 Identify and Describe Control Measures**

40 CFR Part §257.80 (b)(1) states:

*“(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control 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;*

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 3 of 10

*paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.”*

To minimize fugitive particulate emissions, CELP will:

- Apply water to the surface of the pile to hydrate the ash,
  - The ash is deposited in the pile from a belly dump trailer, pulled by a water tank truck. The belly dump trailer minimizes the fall distance from the trailer to the ground.
- Compact the hydrated ash with the on-site ash handling equipment, and
- Apply water as needed to control dust on paved and unpaved surfaces leading to the landfill.

The ash generated at the CELP facility is a pozzolanic material which contains both anhydrous calcium sulfate (CaSO<sub>4</sub>) and unreacted calcium oxide (CaO), also known as quicklime or unslaked lime. Both compounds have a strong chemical affinity to absorb water, forming a mixture of hydrated calcium sulfate (CaSO<sub>4</sub>·2H<sub>2</sub>O, also known as gypsum) and hydrated lime (Ca(OH)<sub>2</sub>, also known as slaked lime). The result of adding water to the ash is that it cures and forms a solid mortar/concrete like compound.

## **2.2 Conditioned CCR**

40 CFR Part §257.80(b)(2) states:

*“(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.”*

As part of ash disposal, CELP hydrates the boiler ash in the ash landfill. This practice prevents wind dispersal. CELP does not over-hydrate the ash, resulting in free liquids. CELP has followed this practice throughout the history of landfill.

## **2.3 Citizen Complaints**

*“(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.”*

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 4 of 10

This fugitive dust control plan will be posted on CELP’s CCR website. Should CCR fugitive dust events occur, citizens can call the facility at the following phone number:

Rosebud Power Plant  
Phone: 406-748-4729

CELP will maintain a log of citizen complaints and corrective actions taken in accordance with the requirements of the CCR Rule.

**2.4 Effectiveness of the Dust Control Plan**

Title 40 CFR Part Part §257.80(b)(4) states:

*“(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.”*

CELP routinely inspects the ash pit as required by the CCR Rule and the facility’s air quality permits. Once per year, concurrent with preparation of the Title V annual compliance certification, citizen complaints and inspection records for the ash pit will be reviewed to identify possible plan deficiencies. If more than two fugitive dust incidents are identified during the review, a more careful assessment of the plan and plan implementation will be undertaken, and the results included as a revision to the plan. Should CELP employees or surrounding citizens observe excess fugitive dust emanating from the ash landfill, CELP will evaluate adding additional control measures, such as those identified in 40 CFR §257.80(b)(1).

**2.5 Preparation of the Initial Fugitive Dust Control Plan**

Title 40 CFR Part §257.80(b)(5) states:

*“(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)”*

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 5 of 10

CELP has prepared this initial CCR fugitive dust control plan to satisfy this requirement. The CCR fugitive dust control plan will be placed in the facility's operating record as required by § 257.105(g)(1).

## **2.6 Plan Amendments**

Title 40 CFR Part §257.80(b)(6) states:

*“(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.”*

Should there be a change in condition that would substantially affect the written plan, CELP will amend this fugitive dust control plan and place it in the operating record in accordance with this requirement.

## **2.7 Professional Engineer Certification**

Title 40 CFR Part §257.80(b)(7) states:

*“(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.”*

This CCR fugitive dust control plan will be certified by a qualified professional engineer. The certification will appear in Section 6 of this plan.

## **3 Annual Report**

Title 40 CFR Part §257.80(c) states:

*“(c) Annual CCR fugitive dust control report. The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the*

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 6 of 10

*initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by § 257.105(g)(2)."*

CELP shall prepare the required annual report and place it in the operating record in accordance with the requirements of §257.80(c).

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 7 of 10

#### **4 Recordkeeping, Notification, and Internet Requirements**

40 CFR Part §257.80(d) states:

*“(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g).”*

CELP will comply with the applicable recordkeeping, notification, and internet requirements of the CCR Rule.

#### **5 Citizen Complaint and Corrective Action Log**

CELP shall document citizen complaints and corrective actions. CELP will maintain these records on-site. These records will be included in the annual fugitive dust control report as required by §257.80(c). Refer to sections 2.3 and 2.6 of this plan for additional information.

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 8 of 10

## 6 Professional Engineer Certification

I certify that this initial Fugitive Dust Control Plan prepared for Colstrip Energy Limited Partnership meets the requirements of the Coal Combustion Residuals Rule included in 40 CFR Part §257.80(b)(1) – (6) as of the date of my signature below.

  
(Erica K. Campeau, P.E.)

Date: 10/14/2015





**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 9 of 10

## **Appendix A: Citizen Complaint Log**

**ROSEBUD POWER PLANT  
PLANT ENVIRONMENTAL PROCEDURES**

Subject:	Coal Combustion Residuals Rule Fugitive Dust Emissions Control Plan	Revision No:	ENV-6
Issued Date:	October 2, 2015	0	
Revision Date:			Page 10 of 10

**Fugitive Dust Citizen Complaint Log**

<b>Date and Time of Complaint:</b>	
<b>Citizen's Name and Contact Information:</b>	
<b>Complaint Received By:</b>	
<b>Describe Citizen' Complaint:</b>	
<b>Describe Corrective Actions and Follow-Up:</b>	