

## **1.0 INTRODUCTION**

This fugitive dust control plan has been prepared to meet the requirements of 40 CFR 257.80(b).

The Pleasant Prairie Ash Landfill consists of one cell that went into operation during the 4<sup>th</sup> Quarter of 2014. Under normal conditions and circumstances, nearly 100 percent of CCR generated at the Pleasant Prairie Power Plant (PPPP) is beneficially utilized. Disposal activities at the landfill are generally limited to CCR system cleanings during PPPP outages and other special events.

## **2.0 FUGITIVE DUST CONTROL MEASURES**

**Conditioning and Delivery of CCR:** All CCR delivered to the Pleasant Prairie Ash Landfill are conditioned with water at the source prior to transporting the materials to the landfill. Water is added to the CCR at the source in sufficient quantities such that the CCR is not dusty during transport or delivery. CCR will also be conditioned at the source as necessary to the extent that the delivered CCR does not contain free water.

All CCR is delivered to the Pleasant Prairie Ash Landfill in dump trucks equipped with deployed tarpaulins to minimize generation of dust during transport.

**Access Road:** The Pleasant Prairie Ash Landfill access road is paved to minimize the generation of dust due to truck traffic. The paved surface also facilitates sweeping and watering as described below.

The access road is swept and watered as necessary to minimize the accumulation of dust and dirt on the road surface that might become airborne due to truck traffic.

The access road has a posted speed limit of 25 MPH to help minimize the generation of airborne dust due to traffic.

**Compaction and Grooming:** CCR is unloaded from trucks at the designated disposal area in the active landfill area as appropriate. Although CCR are conditioned for transport, they may not be delivered at a moisture level necessary to achieve adequate compaction. If materials are delivered dry of the optimum compaction range, water is applied to the material by a water truck. If materials are delivered wet of the optimum compaction range, they are allowed to dry. CCR delivered to the Pleasant Prairie Ash Landfill are graded and compacted as soon as the materials are within the optimum compaction moisture range.

The entire surface of the active landfill is kept groomed to minimize the amount of loose material that could become airborne under windy conditions. The landfill is groomed under moist conditions to facilitate compaction of the surface and to minimize dust

generation during the grooming process. Back-dragging the surface with a bulldozer or front end loader is the normal effective method of grooming the landfill surface.

**Active Area Traffic Control:** Networks of roads within the active area of the landfill provide access to the disposal area. These roads are constructed of bottom ash and minimize the need to have traffic routed over areas with fine grained surfaces, such as fly ash. Bottom ash provides structurally sound all-season roads, containing low fines content. These bottom ash roads are watered regularly while trucks are hauling to minimize dust generation due to traffic.

**Active Area Exit:** To minimize track-out onto the access road, all trucks and equipment are routed over a stone tracking pad and over a cattle guard prior to leaving the active landfill area to remove material that may be adhering to the truck tires. Stone tracking pads are groomed as they become clogged with fines and are replaced as necessary.

**Control of Wind Generated Dust in Active Area:** As discussed above, the Pleasant Prairie Ash Landfill is generally inactive between PPPP outages. The materials disposed of in the landfill contain a large percentage of Class C fly ash, which hydrate when exposed to water to form a crust on the surface of the landfill. This crust forms an effective barrier to the generation of fugitive dust. Traffic within the active cells is routed on bottom ash roads, as described above, to prevent degradation of the surface crust layer. The surface crust is reestablished as necessary by wetting exposed CCR surfaces with a water truck equipped with spray bars and water jets. Leachate generated at the landfill is used and is supplemented as necessary with clean water. Only clean water is applied to the access road. Compaction and grooming activities discussed above are also utilized to control the generation of fugitive dust within the active area of the landfill.

**Final Cover:** Due to the success of our beneficial use program, CCR disposal activities at the Pleasant Prairie Ash Landfill are fairly minimal. CCR that is delivered to the landfill for disposal are placed in the designated disposal area and sections of final cover are installed as soon as final waste grades are achieved over a sufficient area to support a practical final cover installation work scope.

### **3.0 CITIZEN COMPLAINTS**

Citizen complaints will be routed to the Facility Manager for the Pleasant Prairie Ash Landfill. Citizen complaints are generally received by the We Energies Call Center at (800) 242-9137, but may also be received by the Control Room, Media Relations, etc. The Facility Manager will prepare a complaint summary including information provided by the citizen (such as name, date, time, nature of complaint), a summary of conversations with the citizen and a summary of any actions taken to address the citizen complaint. Complaint summaries will be included in the annual fugitive dust control report as required by 40 CFR 257.80(c).

**4.0 ASSESSMENT OF FUGITIVE DUST CONTROL PLAN**

The fugitive dust control measures outlined in this plan were developed as part of the plan of operations for the Pleasant Prairie Ash Landfill in accordance with Chapter NR506 of the Wisconsin Administrative Code. These fugitive dust control measures have been in effect for years and have been effective in minimizing the generation of airborne dust at the facility. The continuing effectiveness this fugitive dust control plan will be evaluated during the weekly and annual inspections required by 40 CFR 257.84.

**5.0 CERTIFICATION**

To meet the requirements of 40 CFR 257.80(b)(7), I Timothy C. Muehlfeld, hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR 257.80.

