

Geotechnical Environmental Water Resources Engineering

Fugitive Dust Control Plan

We Energies Presque Isle Power Plant Ash Landfill #3 Marquette, Michigan

Submitted to:

We Energies 333 West Everett Street, A231 Milwaukee, Wisconsin 53203

Submitted by:

GEI Consultants of Michigan, P.C. 3159 Voyager Drive Green Bay, Wisconsin 54311 920.455.8200

December 2019, Rev 1

Project 1610536



Table of Contents

1.	Introduction Fugitive Dust Control Measures		<u>3</u> 4
2.			
	2.1	CCR Management	4
	2.2	Access Road and Truck Traffic	4
	2.3	Dust Suppression within Landfill	4
	2.4	Assessment of the Fugitive Dust Control Plan	4
	2.5	Amendment of the Fugitive Dust Control Plan	4
3.	Procedure to Log Citizen Complaints		5
4.	Certification		6

Revision History

Revision 0 – Original dust control plan dated October 19, 2015.

Revision 1 – Update of the original dust control plan. The landfill is closed and in long-term care as of October 21, 2019 with the construction documentation report approval from the Michigan Department of Environment, Great Lakes, and Energy.

1. Introduction

We Energies owns the Presque Isle Power Plant (PIPP) Ash Landfill #3, located in Marquette, Michigan. PIPP Ash Landfill #3 was used for the disposal of coal combustion residuals (CCR) from October 8, 2005 until October 21, 2019. The landfill is permitted by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) under Construction Permit No. 0400 dated February 27, 2002. The permit was issued in accordance with Part 115, Solid Waste Management of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

This fugitive dust control plan was prepared to meet the requirements of 40 CFR 257.80(b). Revision 0 was issued on October 19, 2015 for an active CCR landfill. Revision 1 updates the dust control plan for a CCR landfill that is closed and in long-term care. The landfill began the 30-year long-term care period with the issuance of the Cell 2 Construction Documentation Report approval from the Michigan Department of Environment, Great Lakes, and Energy dated October 21, 2019.

2. Fugitive Dust Control Measures

2.1 CCR Management

CCRs have been deposited in the landfill for permanent disposal. With the closure of PIPP Landfill #3 and construction of the final cover system, no additional CCR will be placed in the landfill.

2.2 Access Road and Truck Traffic

No trucking of CCRs will take place during post-closure.

2.3 Dust Suppression within Landfill

No CCR will be exposed to the atmosphere during post-closure. The constructed final cover will prevent the generation of dust. Additional dust suppression measures are not necessary.

2.4 Assessment of the Fugitive Dust Control Plan

The fugitive dust control measures outlined in this plan are part of the existing operations plan for the We Energies PIPP Landfill # 3 and part of the Construction Permit No. 0400 dated February 27, 2002 issued by the MDEQ in accordance with Part 115, Solid Waste Management of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Revision 1 updates the original dust control plan for a CCR landfill that is closed and in postclosure care. The continuing effectiveness of this fugitive dust control plan will be evaluated during the weekly and annual inspections required by 40 CFR 257.84 and quarterly inspections completed by the MDEQ. Modifications to this plan will be made on an as needed basis.

2.5 Amendments to the Fugitive Dust Control Plan

The continuing effectiveness of this fugitive dust control plan will be evaluated during the weekly and annual inspections required by 40 CFR 257.84. Modifications to this plan will be made on an as needed basis during the post-closure period.

Citizen complaints will be received by the We Energies Call Center at (800) 242-9137 who 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. Certification

"I, John, M. Trast, P.E., hereby certify that I am a licensed professional engineer in the State of Michigan in accordance with Article 20 of the Occupational Code, Public Act 299 of 1980, as amended. This document has been prepared in accordance with the Michigan Administrative Rules, Department of Licensing and Regulatory Affairs, Professional Engineers – General Rules, Part 3 – Standards of Practice and Professional Conduct; 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 of 40 CFR 257 and Part 115 of PA 451, as amended.

John M. Trast, P.E. Licensed Professional Engineer No. 43731 Vice President/Senior Waste Management Leader GEI Consultants, Inc.

