

COAL COMBUSTION RESIDUAL FUGITIVE DUST CONTROL PLAN Chesterfield Power Station

Prepared for

Dominion Energy Virginia
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Chester, Virginia 23836



**Dominion
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FIGURE

Figure 1 – CCR Management Areas

ATTACHMENTS

Attachment 1 – Fugitive Dust Complaint Form

Attachment 2 – Record of Plan Review Log

LIST OF ACRONYMS

BACT	Best Available Control Technology
BU	Beneficial Use
CCR	Coal Combustion Residuals
Dominion	Dominion Energy Virginia
FDCP	Fugitive Dust Control Plan
FFCP	Fossil Fuel Combustion Products
FGD	Flue Gas Desulfurization
LAP	Lower Ash Pond
NSR	New Source Review
Station	Chesterfield Power Station
UAP	Upper Ash Pond
VADEQ	Virginia Department of Environmental Quality
VSWMR	Virginia Solid Waste Management Regulations

1.0 STATION INFORMATION

Chesterfield Power Station (Station) is a coal-, oil- and natural gas-fired generating station located in Chester, Virginia. Owned and operated by Virginia Electric and Power Company, d/b/a Dominion Energy Virginia (Dominion). The Station produces fly ash, bottom ash, and flue gas desulfurization (FGD) materials that are either transported off-site for disposal or beneficial use (BU) or are deposited in the on-site Fossil Fuel Combustion Products (FFCP) Management Facility (FFCP Management Facility) permitted by the Virginia Department of Environmental Quality (VADEQ).

Historically, fly ash and bottom ash produced as by-products of coal combustion were stored in on-site surface impoundments. Pursuant to EPA's rule *Disposal of Coal Combustion Residuals (CCR) From Electric Utilities* promulgated under 40 CFR Part 257 Subpart D, power companies are required to either close the impoundments in-place (i.e., regrade the CCR to drain and place a cover system on top) or close the impoundments by removal (i.e., excavate CCR and place in an approved landfill). Dominion ceased storage of CCR produced from ongoing power production operations at the Station in the on-site impoundments in 2017 and since then has been disposing CCR at the FFCP Management Facility or transporting it offsite for beneficial use. Dominion plans to close the existing CCR impoundments by excavating the CCR and transporting it to the FFCP Management Facility or offsite for BU or disposal.

Synthetic gypsum formed as a by-product of the Station's flue gas desulfurization system is stored in a drive-through building prior to being hauled offsite for use in the manufacture of drywall.

The Station's FFCP Management Facility began operation in November 2017 and was originally authorized for construction and operation under a new source review (NSR) permit issued by the Virginia Department of Environmental Quality (VADEQ) on January 1, 2016. This permit authorized operation of new fly ash and bottom ash handling systems for ongoing operations as well as gypsum handling operations and fly ash silos. Conditions of this permit were eventually transitioned into the facility's Title V operating permit, Permit No. PRO50396.

First, fly ash generated at the Station is transported pneumatically to ash silos located on the western side of the Station. Trucks drive under the silos, are loaded with ash, tarped, driven across a scale, and cross the bridge to the FFCP Management Facility for disposal. Following dewatering in a new bottom ash management area, bottom ash is loaded into trucks and taken offsite for beneficial use or to the FFCP Management Facility for disposal.

Excavation and hauling activities of CCR stored in the existing impoundments was initially authorized under a NSR permit issued by DEQ on September 30, 2020. This permit was

then amended on April 16, 2021 to incorporate construction and operation of a BU Loadout Operation at which CCR will be unloaded, temporarily stored and loaded into railcars for off-site transport for beneficial use.

2.0 BACKGROUND

2.1 Federal and State Requirements

This Fugitive Dust Control Plan (FDCP) identifies control measures that are implemented at the Station to control fugitive dust emissions from CCR materials managed at various locations throughout the Station.

The purpose of the FDCP is to provide a detailed plan of how Dominion will comply with the Air Criteria requirements specified in the *Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule*; specifically 40 CFR Part §257.80(b)(1) through (b)(7). In addition, this plan has been prepared in accordance with solid waste management and air quality permits issued by VADEQ, which have been cross-referenced throughout this document, as well as other regulatory requirements.

3.0 DUST CONTROL PROCEDURES

Dust control procedures are discussed for five CCR management areas where CCR are collected, processed, transported, or disposed including: the Gypsum Storage Facility, the Bottom Ash Management Area, the Lower and Upper Ash Ponds, the BU Loadout Facility and the FFCP Management Facility. The locations of these areas and connecting paved and unpaved roads are shown in Figure 1. The following sections of the FDCP identify the fugitive dust emissions controls for CCR management and Landfilling associated with on-going power production activities, interim CCR control measures in the existing CCR surface impoundments prior to excavation and CCR excavation, management, handling and transportation activities from the existing surface impoundments.

The FDCP cross-references the fugitive dust control compliance requirements required by air permits issued for this project using the applicable permit number and specific condition.

3.1 CCR Management Areas

The following CCR management activities have the potential to generate fugitive dust emissions:

- CCR processing in the Bottom Ash Management Area
- CCR transportation from the Gypsum Storage Facility
- Interim storage and excavation activities in the Upper and Lower Ash Ponds
- CCR handling at the BU Loadout
- CCR disposal at the FFCP Management Facility

The procedures for controlling fugitive dust emissions in these CCR management areas are presented below.

3.2 Bottom Ash Management Area

The bottom ash management area is located on the power block side of the facility. Bottom ash is dewatered in this area, loaded into trucks, and taken offsite for beneficial use or to the FFCP Management Facility. The rate of fugitive dust emissions from the Bottom Ash Area is generally low due to the high residual moisture content of bottom ash even after dewatering. However, weather conditions during drying and management activities can impact the potential for fugitive dust emissions. Control of fugitive dust emissions in the Bottom Ash Management Area is accomplished using wet suppression for materials handling and stockpiles, as needed.

CCR haul trucks operating in the Bottom Ash Management Area follow the operating practices for paved roads described in Section 3.5.3.

Haul trucks will be tarped prior to leaving the Bottom Ash Management Area.

3.2.1 Rationale for Selected Control Measures

The use of wet suppression of CCRs and tarping of trucks are industry accepted methods of controlling CCR fugitive dust emissions at loading areas.

3.3 Gypsum Storage Facility

FGD materials (gypsum) may be transported via conveyor from the Gypsum Storage Building to the barge loading area along the James River or may be loaded into trucks from the partially enclosed storage building for beneficial use. The gypsum is typically moist and does not require additional management to limit the potential generation of fugitive dust emissions. If the gypsum cannot be beneficially used, it is loaded into dump trucks and transported to the FFCP Management Facility.

Gypsum transported from the Gypsum Storage Area to the FFCP Management Facility is loaded into trucks from the partially enclosed storage building, and a tarp is placed over the truck load to prevent fugitive dust from being discharged during transportation of the material. Truck tarps are left in place until the gypsum is placed in the FFCP Management Facility.

Gypsum may be transported offsite for disposal via truck. The gypsum may be loaded into trucks from the partially enclosed storage building and transported via truck with tarps to an approved disposal facility.

Gypsum may be loaded into trucks inside or outside the partially enclosed storage building to be transported for beneficial use, to be placed in the FFCP Management Facility, or for offsite disposal.

3.3.1 Rationale for Selected Control Measures

The use of partial enclosures and tarps and the conditioning of CCRs are industry accepted methods of controlling CCR fugitive dust emissions at loading areas.

3.4 CCR Surface Impoundments

This section addresses controls for fugitive dust emissions from the Lower Ash Pond (LAP) and the Upper Ash Pond (UAP). Neither pond is actively receiving material. The LAP is covered with a geosynthetic rain cover, and the UAP is covered with an intermediate soil cover until closure commences.

3.4.1 Lower Ash Pond

3.4.1.1 Interim Measures Prior to Removal

The interim activities at the LAP prior to CCR excavation include installation of truck washes, road access improvements, ongoing CCR maintenance, and other miscellaneous activities to support the future closure of the LAP. Maintenance of the geosynthetic rain cover placed over the material to eliminate dusting and the generation of contact stormwater remains paramount to the current LAP status. During interim activities, water is applied to the materials as needed. Maintaining adequate vegetation at the LAP minimizes fugitive dust emissions. Other dust suppression materials such as sweeper trucks and synthetic covers will be placed to manage any fugitive dust.

3.4.1.2 CCR Excavation and Handling Activities

CCR managed within the LAP from excavation through truck loading and hauling is kept adequately moist using water suppression or other suppressants as needed to minimize fugitive dust emissions during storage, handling and transfer operations. Loaders from stockpiles minimize the drop distance to haul trucks while maintaining adequate clearance to ensure safe operation.

CCR haul trucks operating in the LAP follow the best management operating practices for unpaved roads described in Section 3.5.1. In addition, a watering truck applies water as necessary to roadway surfaces within the CCR management areas to minimize fugitive dust emissions. Heavy equipment is operated at low speeds to minimize fugitive dust emissions.

Prior to hauling of CCR from the LAP, truck beds are covered with tarps.

At least once per week, Dominion or its contractor visually surveys the activities in the LAP, including interior and perimeter roads, and observes the downwind property boundary for a period of at least 10 minutes to determine whether visible emissions are leaving the property boundary. If visible emissions occur for six consecutive minutes, the observer determines the cause(s) of excessive emissions and corrective action(s) are implemented in a timely manner in accordance with safe operating practices while not causing surface water runoff issues. Observations and corrective actions taken are recorded and records maintained.

3.4.1.3 Rationale For Selected Control Measures

Moisture conditioning of CCR and cover of inactive areas (soil or geosynthetic) as an interim control measure is an industry-accepted method of fugitive dust prevention. Application of wet suppressants on excavated CCR during management activities, application of wet suppressants on roadway surface, reduction of drop distances during CCR transfer and reduction of speed of heavy equipment are industry-accepted methods to minimize fugitive dust and have been

determined to represent Best Available Control Technology (BACT) required by the facility's NSR air permit issued by VADEQ on April 16, 2021.

3.4.2 Upper Ash Pond

3.4.2.1 Interim Measures Prior to Removal

The compacted CCR placed in the UAP has been covered with soil and vegetated. Water is sprayed on the access roads along the Upper Ash Pond as needed to minimize fugitive dust emissions. Maintaining adequate vegetation at the Upper Ash Pond minimizes fugitive dust emissions. Vehicles are required to comply with the access road speed limits that are posted.

3.4.2.2 CCR Excavation and Handling Activities

CCR managed within the UAP from excavation through truck loading and hauling are kept adequately moist using water suppression or other suppressants as needed to minimize fugitive dust emissions during storage, handling and transfer operations. Loaders from stockpiles minimize the drop distance to haul trucks while maintaining adequate clearance to ensure safe operation.

CCR haul trucks operating in the UAP follow best management operating practices for unpaved roads described in Section 3.5.1. In addition, a watering truck applies water as necessary to roadway surfaces within the CCR management areas to minimize fugitive dust emissions. Heavy equipment is operated at low speeds to minimize fugitive dust emissions.

Prior to hauling of CCR from the UAP, truck beds are covered with tarps.

At least once per week, Dominion or its contractor visually surveys the activities in the UAP, including interior and perimeter roads, and observes the downwind property boundary for a period of at least 10 minutes to determine whether visible emissions are leaving the property boundary. If visible emissions occur for six consecutive minutes, the observer determines the cause(s) of excessive emissions and corrective action(s) are implemented in a timely manner in accordance with safe operating practices while not causing surface water runoff issues. Observations and corrective actions taken are recorded and records maintained.

3.4.2.3 Rationale For Selected Control Measures

Soil cover and vegetation as an interim control measure is an industry-accepted method of fugitive dust prevention. Moisture conditioning of CCR and cover of inactive areas (soil or geosynthetic) as an interim control measure is an industry-accepted method of fugitive dust prevention. Application of wet suppressants on excavated CCR during management activities, application of wet suppressants on roadway surface, reduction of drop distances during CCR transfer and reduction of speed of heavy equipment are industry-accepted methods to minimize fugitive dust and have been determined to represent BACT required by the facility's air permit

issued by VADEQ on April 16, 2021.

3.5 Haul Roads

Fugitive dust control measures for unpaved and paved roads are described in the following subsections. Routine inspections and maintenance (as required) of the wheel wash station, watering trucks and sweeper trucks will be performed in order to ensure proper operation as they are the primary measures to control emissions due to CCR haul truck traffic on paved and unpaved roads. Maintenance records will be maintained and provided upon request.

3.5.1 Unpaved Haul Roads

The following Best Management Practices are observed to reduce fugitive dust emissions from CCR haul truck traffic on unpaved roads in the Bottom Ash Management Area, LAP, UAP and FFCP Management Facility and unpaved haul routes in between these areas:

- A watering truck is maintained on-site and is used to apply water, which could include addition of dust suppressant additives, to maintain surface moisture content to minimize airborne emissions. Water is not applied if ambient temperatures are predicted to fall to sub-freezing levels and/or would create hazardous travel conditions.
- If visible emissions from haul traffic on unpaved roads are observed, Dominion takes immediate corrective action and eliminates traffic until sufficient water is applied to mitigate visible emissions.
- The speed of haul vehicles on unpaved roads is maintained at 25 mph or less. Vehicle speed will be further reduced, as necessary, on unpaved roads when water cannot be applied to roads in order to minimize fugitive dust from becoming airborne. Contractors receive instruction on maximum permissible speed during orientation conducted prior to working at the site.
- Weekly visual observations of visible emissions from unpaved roads in and around CCR management areas are conducted as described in the relevant subsections covering those CCR management areas.
- Tarps are used to cover haul truck beds during transport of CCR from the LAP and UAP. Movement of CCR using haul trucks prior to transport from the LAP and UAP, such as transport of CCR from the point of excavation to dewatering areas, does not need to be covered because the moisture content of CCR is sufficiently high to prevent fugitive dust.

3.5.2 Rationale for Selected Control Measures

The use of water and dust suppressants, limiting haul trucks speed to 25 mph or less and the use

of tarps for covering transported material represent Best Management Practices, BACT and industry-accepted practices for control of fugitive dust emissions from unpaved road truck traffic.

3.5.3 Paved Roads

The following practices are carried out to reduce fugitive dust emissions from CCR haul truck traffic on paved roads:

- Dirt from haul truck traffic leaving the Bottom Ash Management Area, LAP, UAP and the FFCP Management Facility is removed at the nearest wheel wash station depicted in Figure 1 to reduce deposition on paved road surfaces, or equivalent washing procedure, weather permitting. Wash stations are not used if ambient temperatures are predicted to fall to sub-freezing levels and would create hazardous travel conditions. In the event that weather conditions do not permit safe use of the wheel wash stations, the speed of haul vehicles is reduced as necessary to minimize fugitive dust from becoming airborne.
- Paved roads are swept each day of CCR hauling to maintain a clean condition on each day of operation, except on days when roads remain wetted by rain, precluding sweeping.
- Paved roads are watered as necessary to reduce air emissions
- Logs of sweeping activities and operation of wheel wash stations are maintained on-site. Deviations from standard operating practices such as suspension of wheel washing due to freezing conditions or roads not being swept when roads remain wetted by rain are noted. Daily logs are maintained on-site by contractors on days CCR hauling is occurring; completed logs collected on weekly basis and maintained by Dominion staff.
- Road deposits resulting from haul traffic and soil sediments from soil erosion that are not readily cleaned by normal sweeping activities are promptly removed.
- If visible emissions from haul traffic that can be seen on paved roads or are observed at any time that will leave the property, Dominion takes immediate corrective action and reduces or eliminates haul vehicle traffic until road sweeping or water is applied to mitigate visible emissions.
- At least once per week, Dominion or its contractor visually surveys the paved roads between the LAP/UAP and the FFCP Management Facility and observes the downwind property boundary for a period of at least 10 minutes to determine whether visible emissions are leaving the property boundary. If visible emissions occur for six consecutive minutes, the observer determines the cause(s) of excessive emissions and implements corrective action(s) in a timely manner in accordance with

safe operating practices while not causing surface water runoff issues. Observations and corrective actions taken are recorded and records maintained.

- Haul trucks transporting ash remain covered while traveling on paved roads.

3.5.4 Rationale for Selected Control Measures

The use of wheel washes, road sweepers, roadway watering and dirt deposit removal are considered Best Management Practices, BACT and industry-accepted practices for control of fugitive dust emissions from paved road truck traffic.

3.6 BU Loadout Facility

CCR from the UAP or LAP will be unloaded inside the BU Loadout Facility where the CCR will be pushed via mobile equipment to the loadout area to be loaded into railcars or trucks for transport off-site. Truck wheels will be washed in a truck wash station either before or immediately upon exiting the building.

Emissions from the BU Loadout Facility will be controlled by a misting system as necessary to minimize fugitive dust from unloading/loading and storage pile activities. The building is ventilated through with at least two fabric filtration systems during normal operation to minimize fugitive dust emissions from the BU Loadout Facility.

3.6.1 Rationale for Selected Control Measures

The use of wheel washes and water dust suppression systems are considered Best Management Practices. Use of a building exhaust system to capture and control fugitive dust is considered BACT for materials handling operations.

3.7 FFCP Management Facility and Dry Ash Silo

The FFCP Management Facility and fly ash silos were issued a Certificate to Operate in June 2017 and began receiving CCR in November 2017. These sources are shown on Figure 1.

Dust emissions from ash exiting the dry ash silos are reduced using enclosures and wet suppression prior to being loaded into trucks for transport to the FFCP Management Facility

Dominion employs appropriate techniques to manage potential dust generation in the FFCP Management Facility as follows:

CCR haul trucks operating in the FFCP Management Facility follow the best management operating practices for unpaved roads described in Section 3.5.1. In addition, a watering truck applies water as necessary to roadway surfaces and surface of CCR disposed of within the FFCP Management Facility to minimize fugitive dust emissions. Heavy equipment is operated at low

speeds to minimize fugitive dust emissions.

Haul truck beds are covered with tarps until unloading.

At least once per week, Dominion or its contractor visually surveys the activities in the FFCP Management Facility, including interior and perimeter roads, and observes the downwind property boundary for a period of at least 10 minutes to determine whether visible emissions are leaving the property boundary. If visible emissions occur for six consecutive minutes, the observer determines the cause(s) of excessive emissions and corrective action(s) are implemented as soon as possible while not causing surface water runoff issues. Observations and corrective actions taken are recorded and records maintained.

Active areas of the landfill receiving CCR will be tracked daily using a bulldozer or similar earth moving equipment for recompaction. In addition, one or more dust suppressant techniques will be used to minimize fugitive dust including but not limited to application of surface wetting and crusting agents. When the moisture content of CCR reaches the appropriate level of moisture, use of a roller or other mechanical compaction method will be used. Intermediate cover using one foot of compacted soil or other approved material will be applied to areas within 30 days of becoming non-active and final cover will be applied as approved under the Solid Waste Permit 609. No more than 10 acres of working area in the active portion of the landfill (where CCR is being placed) shall be open at any one time.

Any soil stockpiled at the FFCP Management Facility is kept moist to control dust during storage and handling or covered at all times to minimize emissions.

3.7.1 Rationale for Selected Control Measures

Use of the aforementioned CCR compaction techniques, minimization of active working area, intermediate and/or final cover are all industry accepted methods of proper CCR disposal and requirements of the facility's Solid Waste Permit. Watering of road surfaces and soil stockpiles, application of dust suppressants as needed in the CCR management areas within the FFCP Management Facility, covering of soil stockpiles not in use for 30 days, operation of heavy equipment at low speeds, and covering haul trucks with tarps are consistent with BACT required by the VADEQ and are also industry accepted practices.

4.0 INSPECTIONS AND EVALUATING THE FDCP

4.1 Evaluating the Effectiveness of the FDCP

In accordance with 40 CFR 257.80(4) once per year, Dominion will evaluate the effectiveness of this plan and make any required changes to ensure continued effectiveness of fugitive dust control measures. This evaluation will be based on the number and type of citizen complaints received (if any), observations made during construction activities, and observation of dust collecting in and around the Station, or along the haul roads as well as any fugitive dust issues observed and recorded during weekly visual emissions inspections of the CCR facilities. The FDCP will be amended if necessary, based on the results of that evaluation.

5.0 RESPONDING TO CITIZEN COMPLAINTS

5.1 Responding to Citizen Complaints

Citizen inquiries are documented on the Fugitive Dust Complaint Form and investigated. A sample of the form is in Attachment 1. A copy of the updated form will also be included in the Station's Annual CCR Fugitive Dust Control Report.

Station personnel investigate the inquiry to determine and verify the nature of the concern, location, and contributing factors such as location relative to site operations, proximity, and weather conditions.

The Station's Environmental Representative (or designee) addresses citizen complaints as needed. The form in Attachment 1 includes a section to document any corrective measures taken to address citizen complaints. A list of citizen complaints for the previous year is also placed in the Station's Annual CCR Fugitive Dust Control Report.

5.2 Annual Reporting and Records Retention

The Facility compiles an Annual CCR Fugitive Dust Control Report as required by the CCR rule. This report includes a description of methods taken to control fugitive CCR dust, as well as a record of all citizen complaints and any corrective measures taken to address the complaint(s). The VADEQ is notified about the completion of the annual CCR Fugitive Dust Control Report and the final report is placed on Dominion's publicly accessible website in accordance with the CCR rule.

5.3 FDCP Assessment and Updates

Dominion may amend this FDCP at any time and the revised plan will be placed in the Station's operating record and posted on Dominion's website as required by the CCR rule. Dominion will amend the written plan when 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. Plan amendments (i.e., revision history) will be outlined in Attachment 2 of this plan. The revised FDCP will be re-certified by a professional engineer in accordance with the CCR rule.

6.0 ENGINEERING CERTIFICATION

I hereby certify that I am familiar with the requirements of 40 CFR 257.80, that the FDCP has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and that the FDCP meets the requirements of 40 CFR 257.80. This certification does not relieve the owner or operator of the Facility from preparing and fully implementing this Plan in accordance with the requirements 40 CRF 257.80.

Gabriel W. Lang

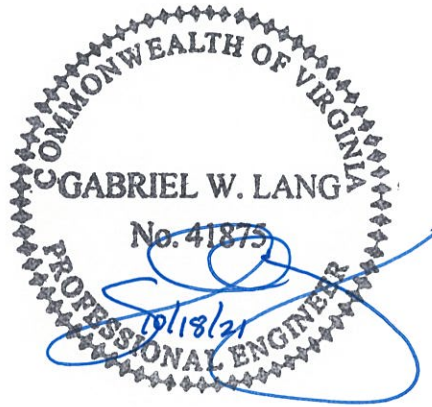
041875

Name of Professional Engineer

Professional Engineer No.

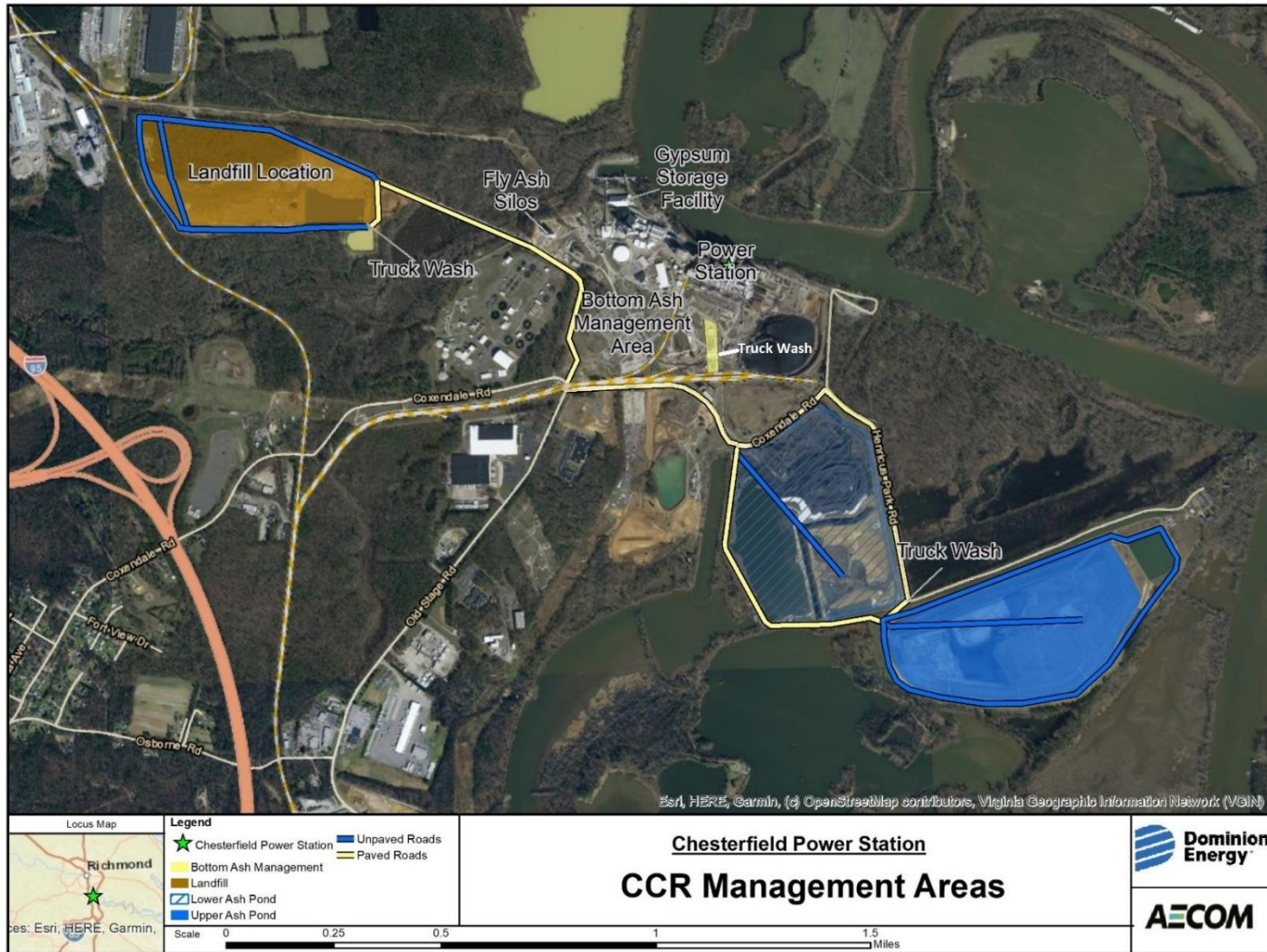
10/18/2021

Date Signed and Sealed



FIGURES

Figure 1: Chesterfield Power Station: CCR Management Areas



Attachment 1
Fugitive Dust Complaint Form

Attachment 1
Fugitive Dust Complaint Form

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FUGITIVE DUST COMPLAINT FORM
Chesterfield Power Station

Date: _____ Compliant Response? Y/N _____

Time: _____ Reference: _____

Surveyor: _____

Weather Conditions: _____

Approximate Location / Distribution of Dust: _____

Dust Description: _____

Suspected Source: _____

Actions Taken: _____

Additional Comments: _____

Attachment 1
Fugitive Dust Complaint Form

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Contact Information

Date/Time: _____

Name: _____ Telephone: _____

Address: _____ email: _____

Maintain this form in the operating record for 1 year from date of survey

Attachment 2
Record of Plan Review Log

