# 2017 ANNUAL DUST CONTROL REPORT

## CCR Unit

## SCE&G Cope Station
## Teamwork Road
## Cope, S.C. 29038

*SCANA Environmental Services*

December 19, 2017

SCE&G®
A SCANA COMPANY

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## LIST OF ACRONYMS

| | |
|---|---|
| CCR | Coal Combustion Residuals |
| CFR | Code of Federal Regulations |
| FGD | Flue Gas Desulfurization |

## SECTION 1

## REGULATORY REQUIREMENTS

The CCR Rule requires owners or operators of Coal Combustion Residuals (CCR) facilities to adopt and document "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" (40 CFR 257.80).

A complete, updated copy of the Dust Control Plan is maintained in the Facility operating record and on the SCANA publicly accessible internet site in accordance with 40 CFR 257.80(a), 257.105(g), and 257.107(g). SCDHEC is notified when this Dust Control Plan, or any subsequent amended version, is placed in the Facility Operating Record and on the SCANA internet site, in accordance with 40 CFR 257.106(g).

In accordance with 40 CFR 257.80(c) an Annual Dust Control Report is prepared to document the following information:

- Description of dust control procedures implemented at the Class III Landfill (LF 3-00028),
- Record of all citizen complaints,
- Description of any corrective actions taken.

The Annual Dust Control Report is completed and placed in the Facility operating record and on the SCANA internet site, as required by 40 CFR 257.80(c), 257.105(g), and 257.107(g), within the specified timeframes. SCDHEC is notified when each Annual Dust Control Report has been placed in the Facility operating record and on the SCANA internet site, in accordance with 40 CFR 257.106(g).

## SECTION 2

## FACILITY INFORMATION

Cope Station is located in Cope, SC. The Facility is a Coal Fired Electric Generation Plant. The facility generates CCR waste from a Dry Scrubber process. This material is a combination of fly ash and lime that is generated from combustion of coal and the FGD Dry Scrubber. As generated it contains moisture and pozzolanic qualities that when placed and compacted results in a hardened material generally not prone to dusting.

This CCR material is collected in onsite silos where it is held until operations require removal. Onsite disposal starts by loading the conditioned material into off road transport trucks at the silo. Water spray fogging may be used as necessary during loading.

Bottom ash is collected wet and is managed in a conditioned state during loading and transport to the onsite landfill.

Transport takes place over paved site roads to the onsite Cope Station Class III landfill. The landfill Permit number is LF 3-00028 permitted under SC Regulations R.61-107. "Solid Waste Management". Site roads are routinely managed by water truck wetting, or vacuum truck as necessary.

Landfill transport and placement occurs during daylight hours generally during weekday operation of the landfill. Material is trucked into the landfill site on paved roads to the operating cell. CCR placement is managed at the cell to consolidate active placement in a minimum footprint to allow traffic to be isolated to areas of placement and off of lifts of rolled material. Coarser Bottom ash is reserved in part and used for access routes within the operating cell along with water truck operation during operation to minimize dust. Temporary cover may be placed on inactive areas of the landfill cell as required. The CCR material as conditioned when spread and rolled will dry with a hard surface which is not prone to allow dust creation.

A Title V permit required "Fugitive Dust Control Plan" is maintained for the balance of plant CCR management and equipment.

## SECTION 3

## DUST CONTROL PROCEDURES

The following sections discuss dust control procedures for (1) CCR landfill unit, and (2) CCR unit travel roads. Cope Station has implemented these dust control procedures, which are applicable and appropriate for site conditions in accordance with 40 CFR 257.80(b)(1).

### 3.1 CCR Landfill

CCR is transported from the generating facility to Cope Station Landfill permitted as a Class III Landfill under SC Regulations R.61-107. "Solid Waste Management" CCR from the generating facility is generated and stored at onsite silos prior to load out at the generating plant. The material is conditioned as held within the silo; misters are employed during loading operation as necessary. Loaded trucks then transport to the landfill over paved site roads.

The following additional dust control procedures are typically implemented for the CCR Landfill.

- Placed material is pushed, spread, and compacted by equipment to maintain slope and grades to minimize erosion and dust.
- Water spray is applied from an onsite water spray tanker truck as necessary during ash placement.
- Travel routes over the active cell are wetted as necessary during operation as well as paved site access roads.
- Coarser bottom ash is reserved in part for surfacing routes within the cell areas as necessary to mitigate dusting.

- During high wind conditions, unloading operations at the working face may be halted as necessary, and additional dust suppression measures may be implemented.

When CCR operations are completed in a given area, as well as prior to any long-term inactivity in a given area, the areas are contoured as needed to reduce the slopes of any exposed CCR. Segregated material such as soil will be used as slope cover as necessary as cell filling progresses. Temporary cover may be placed as necessary over inactive areas.

All dust control procedures that have been implemented at the Class III Landfill are performing as expected and are controlling fugitive dust.

### 3.2 Facility Roads

The following dust control procedures are implemented for roads used for CCR management activities at the Facility, or that are being traveled by equipment employed in CCR management activities.

- Reduced vehicle speeds are observed to reduce dust mobilization.
- During transportation CCR is conditioned by containing adequate moisture to minimize dust potential.
- Paved site roads used for transport to the CCR Unit are sprayed routinely by water trucks during daily operation.
- Specific Paved roads at the Generating Facility maybe cleaned by a sweeper/vacuum truck as necessary.
- Reduced vehicle speeds over active Landfill cells are observed to reduce dust mobilization.

All dust control procedures that have been implemented on the Facility roads are performing as expected and are controlling fugitive dust.

## SECTION 4

## RECORDKEEPING AND REPORTING

### 4.1 Dust Control Plan Inspections

Weekly inspections are performed to monitor dust control procedures and to assist with preparation of this Annual Report. The inspections provide the opportunity to verify that controls are in place and functioning properly. Weekly inspections are also used to identify additional procedures that may be needed to control fugitive dust.

## 4.2 Community Involvement

Cope Station through its parent corporation SCANA has implemented procedures for community involvement, including "logging inquiry involving CCR fugitive dust management at the facility," as required by 40 CFR 257.80 (b)(3). The SCANA publicly accessible internet site provides contact information for the public to contact SCE&G with questions regarding dust management at CCR Units managed by the Company.

During the past year one inquiry involving dust control at this facility was made.

> **Saturday November 18, 2017** – An anonymous complaint was made to SCDHEC regarding dust at the Cope Class III Landfill. The Cope Station Environmental Manager was made aware of the complaint by SCDHEC on Monday November 20, 2017. The complaint was rather ambiguous with no specific detail to which SCDHEC did not seem overly concerned and planned to follow up with a site visit the week of November 27, 2017 as part of their routine periodic visits.
> The Environmental Manager followed up with Landfill staff which indicated that the Landfill was not in operation on the day of the complaint and that the Landfill had been secured the day prior being done as standard operating procedure at the end of an operating day and more so before leaving for the weekend.
> The Environmental Manager also discussed with lab staff and operators that were working on Saturday November 18th to see if they had noticed any dust issues. They conveyed that no dust issues were observed.
> Observance of fugitive dust would be difficult to substantiate from the ground by adjacent property owners or passing travelers due to the forested buffer surrounding Cope Station. Consequently, an observer would have to be on Cope property, which is secure and only accessible through the manned security entrance, to be in the proximity of the landfill it identify a dust issue.
> SCDHEC visited the Cope Station Landfill on Monday November 27, 2017 and found the condition of and operations at the Landfill to be in accordance with all applicable regulations with no witnessed violations or concerns.

## 4.3 Corrective Measures

At any time deficiencies are observed or complaints have been made regarding fugitive dust as a result of operations at the facility, action must be taken to correct and improve the dust control procedures.

The November 18th complain withstanding, no deficiencies were observed over the course the year that required the need for corrective measures.

## 4.4 Dust Control Plan Assessment, Updates, and Amendments

Cope Station periodically assesses the effectiveness of the Dust Control Plan in accordance with 40 CFR 257.80(b). The Dust Control Plan is reviewed periodically for adherence to the requirements of 40 CFR 257. If more effective prevention and control technology has been field-proven to significantly improve dust controls and is then implemented, the Dust Control Plan will be amended to reflect changes.

Cope Station will also amend this Dust Control Plan in accordance with 40 CFR 257.80(b) whenever there is a change in conditions that would substantially affect the written Dust Control Plan in effect, such as the construction and operation of a new CCR unit. The amended Dust Control Plan will be implemented before or concurrently with the initial receipt of CCR into any new CCR unit(s).

The designated person accountable for dust control at the Facility is responsible for documenting completion of each five-year review, signing a statement as to whether the Dust Control Plan is amended. Technical changes made to this Dust Control Plan will be certified by a qualified Professional Engineer as required by 40 CFR 257.80(b). SCDHEC will be notified in accordance with 40 CFR 257.106(g) when this Dust Control Plan has been amended and placed in the Facility operating record and on the SCANA internet site.

No amendments have been made to the Dust Control Plan in 2017.