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Coal Combustion Residuals Fugitive Dust Control Plan

Virginia Electric and Power Company
Possum Point Power Station
Dumfries, Prince William County, Virginia

GAI Project Number: C150132.00
May 2016



Prepared by: GAI Consultants, Inc.
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Prepared for: Virginia Electric and Power Company
5000 Dominion Boulevard
Glen Allen, Virginia 23060-3308

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1.0 Plan Overview

The Possum Point Power Station (Station) is a combination natural gas and oil fired power generating station, located near Dumfries, Prince William County, Virginia (VA). The Station is owned and operated by Virginia Electric and Power Company, d/b/a Dominion Virginia Power (Dominion). The Station also previously combusted coal for power generation. Dominion is in the process of closing five coal combustion residual (CCR) surface impoundments at the Station.

1.1 Introduction

The United States Environmental Protection Agency's (EPA) CCR rule, which was published on April 17, 2015, and codified in 40 Code of Federal Regulations (CFR) Part 257, Subpart D, requires the development and implementation of a CCR Fugitive Dust Control Plan (Plan) for facilities that own or operate CCR units.

1.2 Plan Description

1.2.1 Purpose and Need

As part of the CCR Rule, facilities managing CCRs are required to create a Plan documenting the measures taken to control fugitive dust emissions from CCRs. This Plan has been prepared utilizing the EPA requirement of 40 CFR 257.80 as a template to address fugitive dust control from all portions of the CCR management process at the Facility, including material handling, transportation, and disposal.

1.2.2 Location and Description of Facilities

There are no current activities at the Station that produce CCRs. CCRs are currently contained in five surface impoundments at the Station that were previously used for their treatment, storage, and/or disposal. The surface impoundments are scheduled to be closed by 2018.

Dominion is committed to the continued implementation of the procedures outlined in this Plan and the prevention of offsite migration of fugitive CCR dust. A copy of this Plan shall be placed in the Facility's operating record and on the Dominion publicly available internet site. The VA Department of Environmental Quality (VDEQ) will be notified that the plan is posted online.

2.0 CCR Fugitive Dust Sources and Control Measures

2.1 Mechanical Dredging of CCR Surface Impoundments

2.1.1 Fugitive Dust Control Measures for Mechanical Dredging of CCR Surface Impoundments

The mechanically dredged CCRs from CCR surface impoundments contain sufficient moisture due to their current placement (i.e., submerged in the pond), to mitigate fugitive emission concerns without additional control measures. CCRs removed from the surface impoundments are temporarily staged onsite, in locations within the footprint of the CCR surface impoundments. The staged CCRs are conditioned with water, as needed, to maintain adequate moisture to mitigate wind erosion.

2.1.2 Rationale for Selected Control Measures

Conditioning CCRs with water is an industry- and agency-accepted method of controlling fugitive CCR emissions.

2.2 CCR Hauling Operations

To facilitate closure of the five surface impoundments, CCRs will be transported on the site using various transportation methods.

2.2.1 Fugitive Dust Control Measures for CCR Hauling Operations

CCRs are hauled primarily in dump trucks, over roads made of both finely crushed gravel and paved asphalt. Speed limits onsite are restricted to minimize dust emissions. Vehicular traffic is also restricted in the construction area. Any equipment handling CCRs will be cleaned prior to leaving the construction area and a water truck will be maintained onsite by the contracted operator. All CCR haul roads will be watered daily, except in wet and freezing conditions, to reduce potential for CCR fugitive dust emissions. Any CCRs removed from the impoundments for offsite disposal will be placed in covered containers and will be loaded in a clean area to prevent CCRs from being tracked offsite.

2.2.2 Rationale for Selected Control Measures

Access control, the conditioning of CCRs, the use of covered containers for offsite shipment, and the enforcement of speed limits are industry-accepted methods of controlling CCR fugitive dust emissions at loading areas. The use and watering of haul roads is an industry-accepted method of controlling fugitive CCR emissions.

2.3 CCRs in Surface Impoundment D

CCRs are contained in Surface Impoundment D, which is scheduled to be closed by 2018. CCRs in Surface Impoundment D are being dewatered as part of the closure process. The CCRs are also being conditioned and compacted in preparation for closure. The CCRs in Surface Impoundment D will be covered with an engineered cover system prior to final closure.

2.3.1 Fugitive Dust Control Measures for CCRs in Surface Impoundment D

CCRs in Surface Impoundment D are conditioned to minimize dust migration. CCRs are also compacted by heavy equipment in preparation for final closure of the impoundment. The CCRs will be covered with an engineered cover system prior to final closure.

2.3.2 Rationale for Selected Control Measures

Conditioning and compacting CCRs and applying a final cover system are industry-accepted methods of CCR unit closure.

3.0 Procedure for Citizen Complaints

3.1 Recording Complaints

The Station will maintain a log of citizen complaints related to fugitive CCR dust. A sample of the log form is in Appendix A. A copy of the updated log form or similar summary of public complaints will also be included in the Station's Annual CCR Fugitive Dust Control Report.

3.2 Addressing Complaints

The Station's Environmental Representative (or designee) will address citizen complaints as needed. The log form in Appendix A includes a section to document any corrective measures taken to address citizen complaints. A copy of the updated log form or a similar summary of corrective measures for the previous year will also be placed in the Station's Annual CCR Fugitive Dust Control Report.

4.0 Assessment of Plan Effectiveness

The Station will periodically evaluate the effectiveness of its current CCR Fugitive Dust Control Plan. This evaluation will be based on the number and type of citizen complaints received (if any), the effectiveness of the responses to those complaints, as well as any fugitive dust issues observed and recorded during routine inspections of the CCR facilities. This Plan will be amended if necessary, based on the results of that evaluation.

5.0 Annual CCR Fugitive Dust Control Report

The Station will compile an Annual CCR Fugitive Dust Control Report as required by 40 CFR 257.80(c). This report will include a description of methods taken to control fugitive CCR dust, as well as a record of all citizen complaints and any corrective measures taken. CCR Fugitive Dust Control Reports will be filed in the facility's operating record and placed on the Dominion publicly-available internet site. The VDEQ will be notified about the availability of the annual report on Dominion's publicly-available internet site.

6.0 Plan Amendments

This Plan may be amended at any time and the revised Plan will be placed in the Facility's operating record and Dominion's publicly-available internet site. The VDEQ will also be notified of the amended plan. The Plan shall be amended if there is a change in conditions that would substantially affect the written Plan in effect, such as construction and operation of a new CCR unit. Minor alterations to the Plan that do not involve the addition or modification of new CCR sources or controls will not require re-certification by a licensed professional engineer. A Plan Amendment Log for tracking revisions is included in Appendix B.

7.0 Professional Engineer's Plan Certification

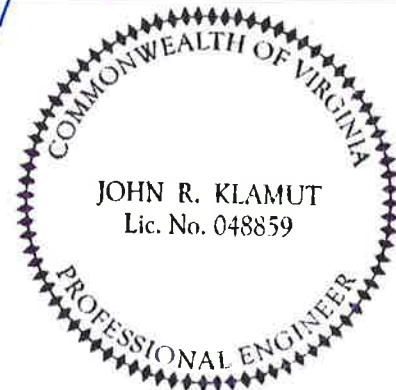
I hereby certify that I am familiar with the requirements of 40 CFR 257.80, and that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and that the Plan meets the requirements of 40 CFR 257.80. This certification does not relieve the owner or operator of the Facility from implementing this Plan, assessing its effectiveness, and amending it as needed to control fugitive CCR dust in accordance with 40 CFR 257.80.

John R. Klamut
Printed Name of Professional Engineer

048859
Commonwealth of Virginia License Number


Signature of Professional Engineer

5/2/2016
Date



APPENDIX A

Sample Citizen Complaint and Corrective Action Log Form

APPENDIX B

Plan Amendment Log Form

