

**2017 ANNUAL DUST CONTROL
REPORT**

CCR Unit

**SCE&G GENCO Williams Station
2242 Bushy Park Road
Goose Creek, S.C. 29445**

SCANA Environmental Services

December 19, 2017



TABLE OF CONTENTS

SECTION 1 REGULATORY REQUIREMENTS.....	1
SECTION 2 Facility Information	1
SECTION 3 Dust Control Procedures	2
3.1 CCR Landfill.....	2
3.2 CCR Surface Impoundment.....	3
3.3 Facility Roads	4
SECTION 4 Recordkeeping and Reporting.....	4
4.1 Dust Control Plan Inspections	4
4.2 Community Involvement	4
4.3 Corrective Measures	5
4.4 Dust Control Plan Assessment, Updates, and Amendments	5

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 083309-1601), and FGD Pond
- 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

Williams Station is located in Bushy Park, SC. The Facility is a Coal Fired Electric Generation Plant. The facility generates CCR waste from a Flue Gas Desulfurization (FGD) Wet Scrubber process. This material is a Calcium Sulfate derivative from treatment of flue gas. CCR derivative FGD letdown waters are managed for solids separation as required in onsite FGD ponds designated C-1 and C-2. These ponds alternate in operation to settle CCR FGD Solids and to de-cant water from the process into the waste water treatment system.

These ponds when alternating in operation are removed from service and allowed to dry and residual sludge cake is recovered using excavation equipment and transported as a moisture containing material with no free liquid to an offsite permitted landfill.

Site roads are routinely managed to reclaim any residual CCR by vacuum equipment, shovels, and scraping as necessary. Water truck spraying of facility roads are conducted during operation as necessary. Trucks used to transport CCR are road transport trucks and trailers which are tarped during transport.

Fly ash which is reclaimed from the pollution control equipment is held in onsite silos. The CCR fly ash if destined for landfill placement is conditioned with water at the enclosed silos by means of rotary ash conditioners where the dry ash is wetted prior to being loaded into transport trucks. The material is loaded by chutes from the rotary conditioners into the truck beds. Bottom ash which is collected in wet silos for storage is dewatered and loaded as a moisture conditioned material into trucks when necessary. All trucks are covered prior to transport to an offsite landfill.

Landfill transport and placement occurs during daylight hours during week day operation of the offsite 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 CCR material. Coarser Bottom ash is reserved in part and used for access routes along with water truck operation during operation. Temporary cover may be placed on inactive areas of the landfill cell as required. A site truck wash is used to rinse the transport trucks prior to the return trip to the operating plant.

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 surface impoundment units, (2) CCR landfill units, and (3) CCR unit travel roads. Williams 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 as necessary from the generating facility to Williams Station Hwy. 52 Landfill permitted as a Class III Landfill under SC Regulations R.61-107. “Solid Waste Management”. The Landfill Permit number is LF 083309-1601. CCR from the generating facility is generated and stored in onsite silos prior to load out at the generating plant. The material is conditioned with moisture either from water application within the silo load out pug mills and loaded by chutes within an enclosed silo load out area or as conditioned wet from the wet collection silos used for bottom ash. Loaded trucks are tarped prior to on road transport to the offsite landfill.

The following additional dust control procedures are typically implemented for active CCR landfill units.

- Open or active landfill cell areas are minimized to five acres or less and the working face will be maintained as small as feasible. Active and inactive areas are managed to direct unloading and placement operations.
- During unloading activities trucks dump ash at designated pile areas which minimizes surface area for dust control.
- Placed material is pushed, spread, and compacted by equipment to maintain slope and grades to minimize erosion and allow sequential placement within active areas of operation.
- Water spray may be 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.
- Unloaded Trucks travel through an onsite truck wash prior to leaving the site.
- During high wind conditions, unloading operations at the working face may be reduced or halted.

When active 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 or FGD material are used as slope cover or as necessary to manage exposed CCR as the cell filling progresses. Temporary cover may be placed as necessary over temporarily inactive areas.

Following the installation, the final cap and cover, including vegetation, will be maintained to reduce the potential for CCR becoming exposed to the atmosphere and dried.

3.2 CCR Surface Impoundment

CCR FGD slurry is collected as a slurry/cake with high water content and the wetted CCR pond surface is present at a lower elevation than its surroundings (e.g., berms) and will not cause dusting.

When the FGD slurry is dewatered and dredged it retains moisture but no free liquids and during dewatering and subsequent transportation for disposal or beneficial reuse it remains wetted with low potential for dusting. When trucks are loaded they are tarped prior to offsite transport to a permitted landfill or for beneficial reuse.

3.3 Facility Roads

The following dust control procedures are typically implemented for roads in active use for CCR management activities at the CCR Units and the Generating Facility, or that are being traveled by equipment employed in CCR management activities.

- Reduced vehicle speeds over active landfill cells are observed to reduce dust mobilization. During high wind conditions, operations and related traffic may be reduced or halted.
- During transportation, CCR is covered using well-fitted tarps to reduce the potential for CCR becoming airborne during truck transport. If tarps are not practical or dusting is observed, water may be added to CCR prior to transportation.
- During non-freezing weather, unpaved roads at the CCR Unit or Generating Facility may be sprayed by water trucks during daily operation as necessary.
- Paved roads at the Generating Facility may be cleaned by a sweeper/vacuum truck and, during periods of high traffic and/or dry weather, may also be sprayed by water truck.

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 no inquiries involving dust control at this facility have been made.

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.

No deficiencies were observed over the course of the year that required the need for corrective measures.

4.4 Dust Control Plan Assessment, Updates, and Amendments

Williams 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 is field-proven to significantly improve dust controls and then implemented, the Dust Control Plan will be amended to reflect changes.

Williams 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.