## AIR CRITERIA DEMONSTRATION

## NEW FGD POND WILLIAMS STATION GOOSE CREEK, SOUTH CAROLINA

**Prepared For:** 

## DOMINION ENERGY SOUTH CAROLINA, INC. COLUMBIA, SOUTH CAROLINA

**Prepared By:** 

## CIVIL & ENVIRONMENTAL CONSULTANTS, INC. PITTSBURGH, PENNSYLVANIA

CEC Project 306-309

MAY 2021



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#### **1.0 OBJECTIVE**

This report has been prepared for South Carolina Generating Company (SCGENCO) and Dominion Energy South Carolina, Inc. (DESC) to demonstrate that the A.M. Williams Station (Williams Station) Coal Combustion Residuals (CCR) Unit described as the New FGD Pond meets the requirements of the United States Environmental Protection Agency (USEPA) CCR Rule which has been published in the Federal Register (FR) on April 17, 2015 as part of the Code of Federal Regulations (CFR) Title 40, Part 257 (§257). Specifically, this report demonstrates the requirements for Air Criteria as defined in §257.80 are met by the New FGD Pond. The New FGD Pond is classified as a new CCR Surface Impoundment by definition in §257.80).

## 2.0 BACKGROUND INFORMATION

## 2.1 INTRODUCTION

The Williams Station is a coal-fired power generation station located at 2242 Bushy Park Road in Goose Creek, South Carolina (refer to Figure 1) that is owned by SCGENCO and operated by DESC. The 650 MW coal-fired electric generating station is generally positioned within a small strip of lowlands between meanders of the Back River (west) and the Cooper River (east) as depicted in Figure 2. The station property is bound by Bushy Park Road to the west and tidal wetlands and/or lowlands border the remainder of the property. The Williams Station wastewater management impoundment complex, comprised of six interconnected separate ponds labeled Ponds A through E and the Coal Pile Runoff Pond, is located north of main station structures (refer to Figures 3 and 4).

Williams Station infrastructure includes a flue gas desulfurization (FGD) air quality control system that produces an FGD wastewater blowdown waste stream that is managed in an on-site FGD Pond originally constructed in 2009 in accordance with applicable South Carolina Department of Health and Environmental Control (SCDHEC) regulations and permits. This CCR Unit is also regulated as a CCR Surface Impoundment per Title 40 CFR, Part 257, Subpart D published in April 2015 (CCR Rule) by the USEPA and subsequent revisions.

## 2.2 DESCRIPTION OF THE CCR UNIT

The FGD Pond is located within the boundaries of the wastewater management impoundment complex at the Williams Station facility and was originally constructed within the footprint of former Pond C in 2009 and in accordance with SCDHEC Bureau of Water Permit Number 19263-IW. The original construction was certified to meet the design documents and Construction Quality Assurance (CQA) Plan by Garrett & Moore (CQA Report, Williams Station FGD Scrubber Blowdown Wastewater Pond, dated September 14, 2009). Figures 2 and 3 depict the location of the New FGD Pond in relation to Williams Station and the wastewater management impoundment complex, respectively. The New FGD Pond occupies essentially the same footprint

as the former FGD Pond and is comprised of two approximate 700,000 gallon forebays (identified as Forebay 1 and Forebay 2) and approximately two acres in total.

The only waste stream to be placed in the New FGD Pond is wet FGD blowdown from the FGD system. The FGD blowdown contains residual gypsum solids that are discharged from the secondary hydrocyclone overflows and pumped to the operating forebay of the New FGD Pond. Each FGD forebay allows the gypsum solids to settle and provide temporary storage until removed, dewatered, and disposed in the Williams Station Highway 52 Landfill. A solids removal treatment system (i.e., Lamella clarifier with one filter press) is used to remove solids prior to discharge to the New FGD Pond. The New FGD Pond is permitted to receive approximately 0.319 million gallons a day (MGD) of wastewater which is the same as the original FGD Pond. There are no non-CCR waste streams discharged to or placed in the New FGD Pond. The New FGD Pond discharges to Pond D which flows into Pond E and then to the National Pollutant Discharge Elimination System (NPDES) permitted outfall before reaching the Cooper River in accordance with SCDHEC NPDES Permit SC0003883 (effective January 1, 2017).

## 3.0 COMPLIANCE DEMONSTRATIONS

The applicable sections of §257.80 (Air Criteria) are presented below in bold, italic font. The responses follow each section of the rule and are provided in normal font.

## 3.1 §257.80 AIR CRITERIA

3.1.1 §257.80(a)(b) Rule Description

40 CFR §257.80(a)(b) states:

(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt 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.

(b) CCR fugitive dust control plan. The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

(b)(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

(b)(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.

(b)(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

(b)(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

(b)(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. The owner or operator has completed the initial CCR fugitive dust control plan when the plan has been placed in the facility's operating record as required by \$257.105(g)(1).

(b)(6) Amendment of the plan. The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by \$257.105(g)(1). The owner or operator must amend the written plan whenever 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.

(b)(7) The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

3.1.2 Compliance with 40 CFR §257.80(a)(b)

The enclosed report in Appendix A entitled "Fugitive Dust Control Pan" prepared by DESC, dated December 19, 2019 was prepared for the FGD Pond in order to meet the requirements of §257.80. Because the New FGD Pond is located within the footprint of the original FGD Pond without modification to the pond configuration or operating procedures, the CEC certifies that the Fugitive Dust Control Plan in Appendix A meets the requirements in 40 CFR 257.80 and remains applicable to operation of the New FGD Pond. CEC has reviewed the Fugitive Dust Plan prepared by DESC and the current site information and has determined that the New FGD Pond complies with CCR Rule §257.80.

## 3.1.3 §257.80(c) Rule Description

#### 40 CFR §257.80(c) states:

(c) Annual CCR fugitive dust control report. The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by \$257.105(g)(2).

3.1.4 Compliance With 40 CFR §257.80(c)

An annual fugitive dust control report will be prepared in accordance with §257.80(c).

3.1.5 §257.80(d) Rule Description

40 CFR §257.80(d) states:

(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(g), the notification requirements specified in §257.106(g), and the internet requirements specified in §257.107(g).

3.1.6 Compliance With 40 CFR §257.80(c)

This demonstration will be placed in the Operating Record and the CCR Unit website, as well as a notification to SCDHEC, to meet the record keeping [§257.105(g)], notification [§257.106(g)], and the internet posting [§257.107(g)] requirements.

## 4.0 CERTIFICATION

This Air Criteria Demonstration confirms that the New FGD Pond complies with the CCR Rule Air Criteria as defined in §257.80. Section 3.0 of this report provides supporting information and conclusions demonstrating that the Fugitive Dust Control Plan for the New FGD Pond meets the design criteria defined in §257.80.

The following certification statement provides confirmation that this report was prepared by a qualified professional engineer and that there is sufficient information to demonstrate that the New FGD Pond meets the Air Criteria defined in §257.80.

## **Professional Engineer's Certification**

By means of this certification, I certify that I have reviewed this report and the enclosed Fugitive Dust Control Plan for the New FGD Pond meets the requirements of Section 40 CFR 257.80.

Scott L. Brown, P.E. Printed Name of Professional Engineer

Signature

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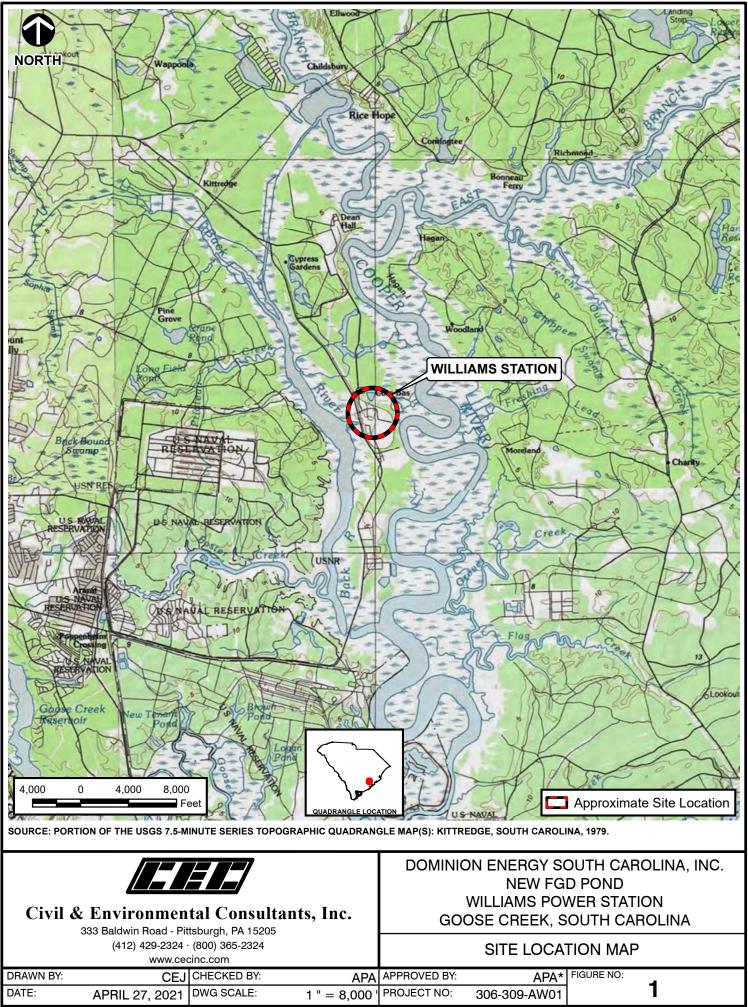
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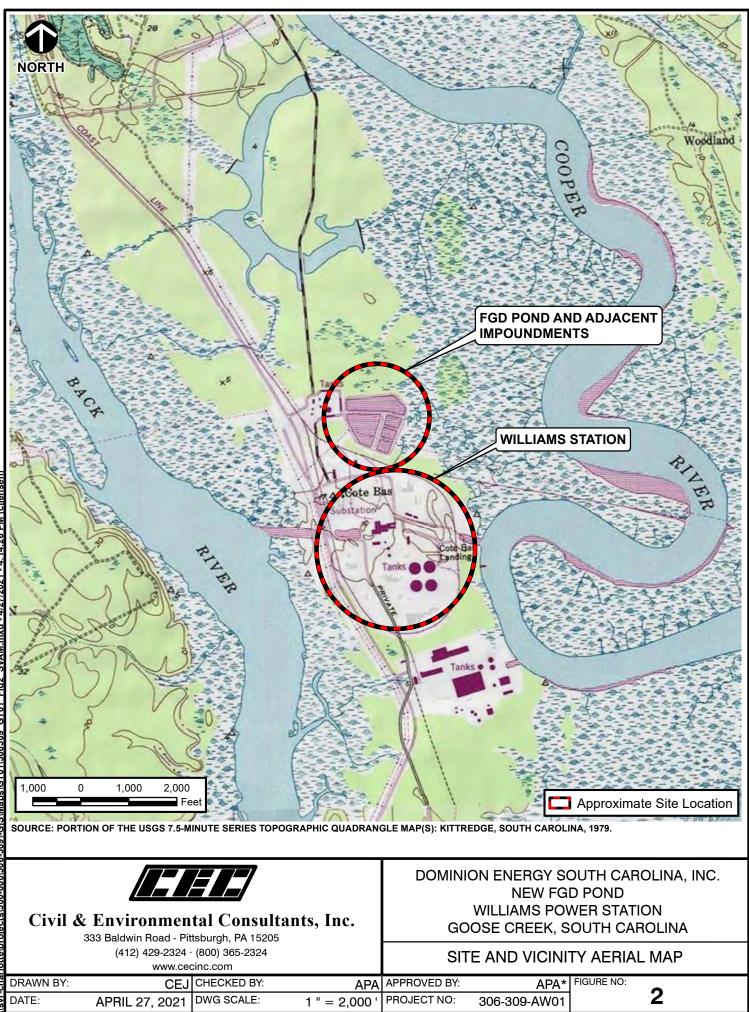
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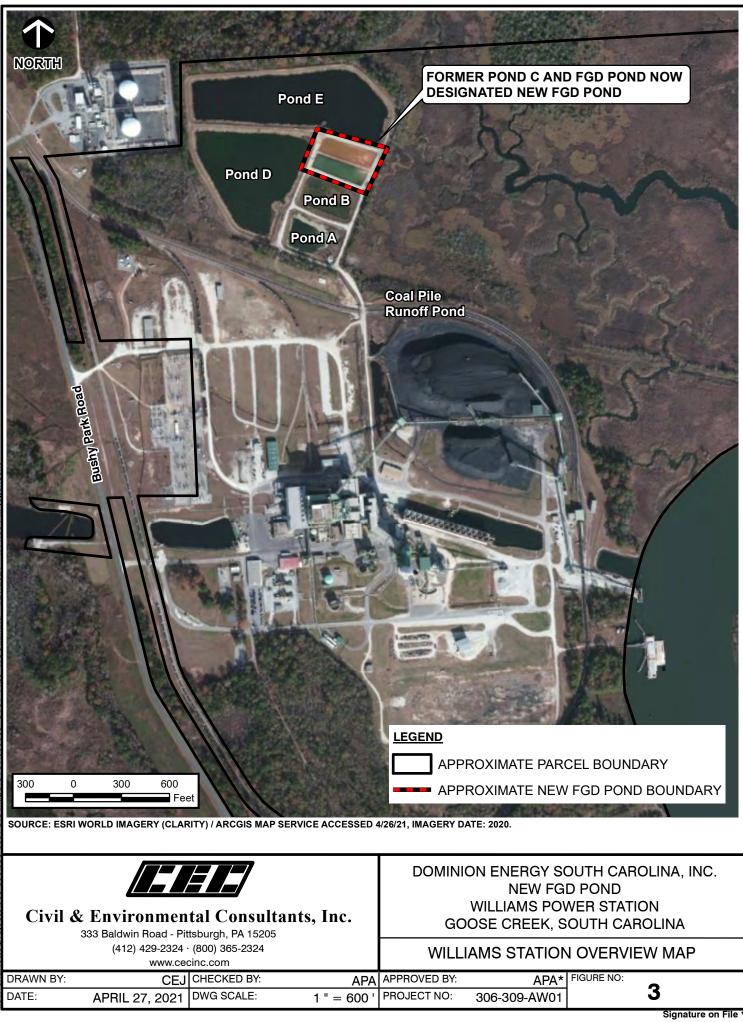


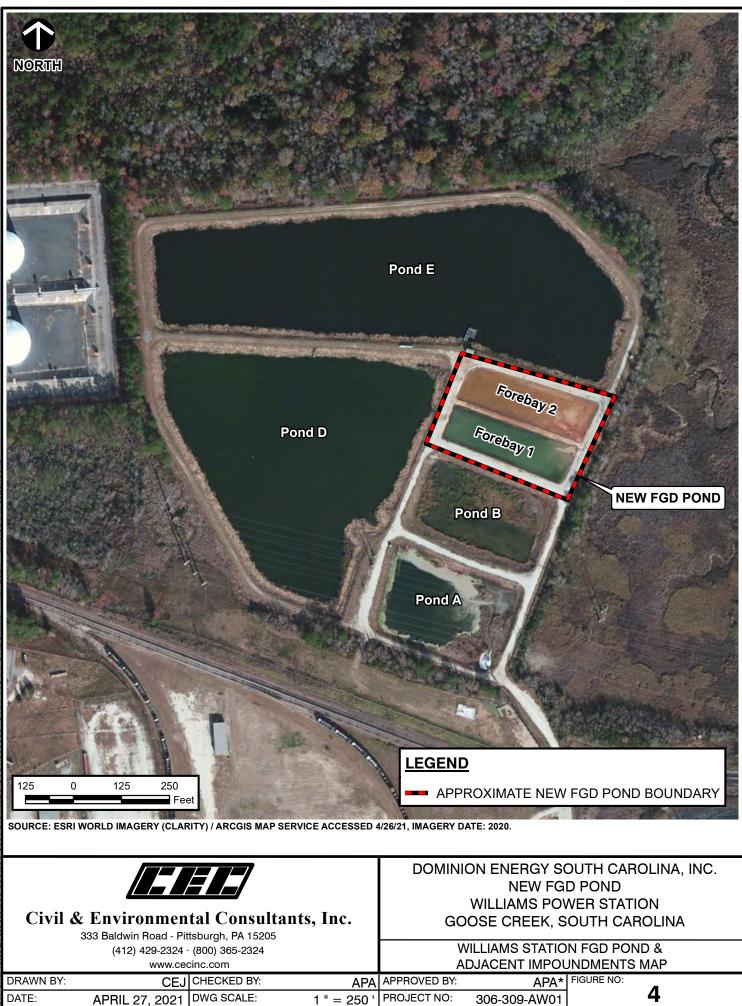
# FIGURES



Signature on File







Signature on File

# APPENDIX A

# FUGITIVE DUST CONTROL PLAN

# FUGITIVE DUST CONTROL PLAN

# **CCR** Units

Dominion Energy South Carolina Williams Station 2242 Bushy Park Road Goose Creek, S.C. 29445

December 19, 2019



## **REVISION HISTORY**

Revision Number	Revision Date	Section Revised <sup>1</sup>	Type of Revision <sup>2</sup>	Summary of Revisions <sup>3</sup>
1	12/19/16	5.3-2-2	Clerical Change	October 19th to December 19th.
2	12/19/19	All sections	Change in	SCANA, SCE&G, SC GENCO to
			owner/operator	Dominion Energy and DESC

#### **Footnotes:**

1. Notation refers to Section#-Paragraph#-Sentence#.

Only Technical Revisions will require updating of signatures.
 Date of Plan revisions and updated Signatures are automatic and not included in Summary of Revisions.

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## LIST OF ACRONYMS

- CCR Coal Combustion Residuals
- CFR Code of Federal Regulations
- DESC Dominion Energy South Carolina
- FGD Flue Gas Desulfurization

## BACKGROUND

The purpose of this CCR Fugitive Dust Control Plan is to identify and describe the Coal Combustion Residuals (CCR) fugitive dust control procedures used to minimize the potential for CCR becoming airborne at the Facility. The following sections provide background information on (1) coal combustion residuals and (2) regulatory requirements.

## 1.1 <u>Coal Combustion Residuals</u>

CCR materials are produced at coal-fired power plants when coal is burned to produce electricity. CCR materials are managed by coal-fired power plant sites, including on-site storage, processing, and final disposal, typically in CCR landfills. Types of CCRs typically generated include fly ash, bottom ash, and flue gas desulfurization (FGD) materials. General characteristics of these CCR materials are described below.

- **Fly** Ash Fly ash is captured from exhaust (flue) gases by emissions control equipment including bag houses and electrostatic precipitators. Fly ash is characterized by clay-sized and silt-sized fine grain materials, consisting of silica, calcium, alumina, iron.
- **FGD Materials** FGD materials are produced by FGD emissions control systems, which are designed and operated to remove sulfur dioxide (SO<sub>2</sub>) from exhaust (flue) gases. FGD materials are generally produced as a cake. FGD materials can form a crust on surfaces, reducing potential for dust issues from FGD storage areas.
- **Bottom Ash** Bottom ash is characterized by sand-sized and gravel-sized materials, which settle by gravity to the bottom of a coal-fired furnace.

## 1.2 <u>Regulatory Requirements</u>

This CCR Fugitive Dust Control Plan (Plan) is developed for the Dominion Energy South Carolina (DESC) Williams Station in accordance with applicable regulations, as discussed below.

## 1.2.1 CCR Rule Requirements

The CCR Rule (40 Code of Federal Regulations [CFR] Part 257, Subpart D) requires preparation of a Dust Control Plan for facilities including CCR landfills, CCR surface impoundments, and any lateral expansion of a CCR unit. Selected definitions from the CCR Rule are provided below.

**CCR** (coal combustion residuals) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

**CCR fugitive dust** means solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney.

**CCR landfill** means an area of land or an excavation that receives CCR and which is not a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground or surface coal mine, or a cave. For purposes of this subpart, a CCR landfill also includes sand and gravel pits and quarries that receive CCR, CCR piles, and any practice that does not meet the definition of a beneficial use of CCR.

**CCR surface impoundment** means a natural topographic depression, manmade excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

**CCR unit** means any CCR landfill, CCR surface impoundment, or lateral expansion of a CCR unit, or a combination of more than one of these units, based on the context of the paragraph(s) in which it is used. This term includes both new and existing units, unless otherwise specified.

**Qualified person** means a person or persons trained to recognize specific appearances of structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit by visual observation and, if applicable, to monitor instrumentation.

**Qualified professional engineer** means an individual who is licensed by a state as a Professional Engineer to practice one or more disciplines of engineering and who is qualified by education, technical knowledge and experience to make the specific technical certifications required under this subpart. Professional engineers making these certifications must be currently licensed in the state where the CCR unit(s) is located.

The CCR Rule requires owners or operators of these 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). Existing CCR surface impoundments and existing CCR landfills must prepare a Dust Control Plan "no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015" (40 CFR 257.80 (b)(5)).

#### FACILITY INFORMATION

Name of Facility:	Williams Station
Name of Operator:	Dominion Energy South Carolina (DESC)
<b>Operator Mailing</b>	Plant Manager
Address:	2242 Bushy Park Road
	Goose Creek SC 29445
Name of Owner:	Dominion Energy South Carolina (DESC)
<b>Owner Mailing</b>	220 Operation Way
Address:	Cayce SC 29033
Location:	Berkeley County, SC

#### **Facility Description**

The Facility is a Coal Fired Electric Generation Plant. 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 wastewater treatment system. These ponds are designated on the facility map as CCR surface impoundments.

These ponds when alternating in operation are removed from service and allowed to dry or contents are processed by filter press. The resulting 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 is 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 stored in onsite silos. The CCR fly ash if destined for landfill placement is conditioned with water at the enclosed silos by means of pugmills where the dry ash is wetted prior to being loaded into transport trucks. The material is loaded by chutes from the pugmills into the truck beds. Bottom ash which is collected

in wet silos for storage is dewatered and loaded as moisture conditioned material into trucks when necessary. All trucks are covered prior to transport to an offsite landfill.

Landfill transport and placement occurs during normal 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. Coarser bottom ash and pyrites are reserved in part and used for access routes along with water truck operation during operation. Temporary cover may be placed on inactive areas and completed slopes or grades. Upon completion the slope or grade is covered with clay and hydroseeded to prevent erosion until the area is permanently closed. 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 which are not CCR Units.

## **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. DESC 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 <u>CCR Surface Impoundment</u>

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. NPDES SC0003883

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

## 3.2 <u>CCR Landfill</u>

CCR is transported as necessary from the generating facility to the offsite DESC 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 3-00001. CCR from the generating facility is collected and stored in onsite silos prior to load out at the generating plant. Fly ash is stored in 2 fly ash silos. The silos are unloaded on as needed basis using pugmills and telescoping chutes to load trucks with either conditioned (water added) or dry fly ash that can be sold to cement companies or disposed of at the Facility's offsite landfill. All trucks are tarped to prevent leakage of ash on to public roads. Bottom ash and pyrites are stored in de-watering tanks. Decanting of the de-watering tanks reduces the moisture content of the ash and pyrites to less than 25%. The pyrites and bottom ash are unloaded into open bed trucks equipped with tarps. The bottom ash can be beneficially used by cement companies or hauled to the Facility's offsite Landfill.

The following additional dust control procedures are implemented for active 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 maybe 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, and additional dust suppression measures will be implemented.
- Unloaded Trucks may travel through an onsite truck wash prior to leaving the site.

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 is placed as necessary over temporarily inactive areas.

## 3.3 <u>Facility Roads</u>

The following dust control procedures are implemented for the roads used for CCR management activities at the CCR Units, at the Generating Facility, and traveled by equipment.

- Vehicle speeds reduced when travelling across active landfill cells to reduce dust mobilization.
- During transportation CCR is conditioned by containing adequate moisture to minimize dust potential and are tarped.
- Paved and unpaved site roads used for transport to the CCR Unit are sprayed routinely by water trucks during daily operation.
- During high wind conditions, unloading operations at the working face may be halted, and additional dust suppression measures will be implemented.

#### TRAINING

Training sessions will be conducted as necessary to update employees on changes in the regulations, laws, or in-house procedures related to CCR management, including dust control procedures. Training records will be maintained at the Facility for five years. Sign-in sheets and topics of discussion at each briefing are maintained for documentation.

## **RECORDKEEPING AND REPORTING**

The following sections provide details regarding: (1) CCR Fugitive Dust Control Plan preparation, (2) community involvement, (3) annual reporting, and (4) CCR Fugitive Dust Control Plan assessment and update process.

## 5.1 <u>CCR Fugitive Dust Control Plan Preparation</u>

Existing CCR surface impoundments and existing CCR landfills must prepare a CCR Fugitive Dust Control Plan "no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015" as required by 40 CFR 257.80 (b)(5).

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

## 5.2 <u>Community Involvement</u>

DESC Williams Station through its parent corporation Dominion Energy 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 Dominion Energy publicly accessible internet site provides contact information for the public to contact DESC with questions regarding dust management at CCR Units managed by the Company. DESC Customer Service will log and transfer inquiries to corporate staff that will coordinate response actions. Documentation of inquiry, response, and any derivative actions will be recorded and included in the annual Dust Control Report.

## 5.3 <u>Annual Reporting</u>

DESC Williams Station prepares annual dust control reports in accordance with 40 CFR 257.80(c) to document the following information:

- Description of dust control procedures implemented at the following CCR Units:
  FGD Pond C "NPDES SC 0003883"
  - Hwy 52 Class III "Landfill LF3-00001"
- Summary of any concerns raised by stakeholders
- Description of any corrective actions taken

The first Annual Dust Control Report will be completed on or before 14 months after the October 19, 2015 initial placement of the Plan in the Facilities Operating Record. Each Annual Dust Control Report is completed and placed in the Facility operating record and on the Dominion Energy 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 Dominion Energy internet site, in accordance with 40 CFR 257.106(g).

## 5.4 CCR Fugitive Dust Control Plan Assessment and Update Process

DESC Williams Station periodically assesses the effectiveness of this Plan in accordance with 40 CFR 257.80(b). The Plan is reviewed at least once every five years from the date of the last review for adherence to the requirements of 40 CFR 257. If more effective prevention and control technology has been field-proven at the time of the review and will significantly improve dust controls, the Plan will be amended to reflect changes. The amended Plan will be implemented within six months of its revision completion. 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 Plan is amended. Technical changes made to this Plan will be certified by a qualified Professional Engineer as required by 40 CFR 257.80(b).

DESC Williams Station will also amend this Plan in accordance with 40 CFR 257.80(b) whenever 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. The amended Plan will be implemented before or concurrently with the initial receipt of CCR into any new CCR unit(s). 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 Plan has been amended and placed in the Facility operating record and on the Dominion Energy internet site.

Dust Control Plan December 2019

#### **SECTION 6**

#### **FACILITY APPROVAL**

This statement is the written commitment of the DESC Williams Station management to provide the resources required to effectively minimize the potential for CCR becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. This CCR Fugitive Dust Control Plan will be fully implemented as herein described, and the Plan will be maintained in the Facility's operating record and on the Dominion Energy publicly accessible internet site.

James R. Mezel Name: Title:

<u>//10/20</u> Date Plant Manager, DESC Williams Station

Date of full implementation: \_\_\_\_\_\_\_

Management Initials

## ENGINEERING CERTIFICATION

Pursuant to 40 CFR 257.80 and by means of this certification, I attest that:

- I am familiar with the requirements of the CCR Rule (40 CFR 257); (i)
- I, or my agent, have visited and examined the DESC Wateree Station; (ii)
- (iii) The CCR Fugitive Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the CCR Rule; and
- (iv) The CCR Fugitive Dust Control Plan meets the requirements of 40 CFR 257.80

CLARK M- ARCITER Printed Name of Qualified Professional Engineer



Signature of Qualified Professional Engineer

Registration/License No. 23104 State: SC