

Annual Fugitive Dust Control Report

For the

Dallman and Lakeside Coal Combustion Residuals Surface
Impoundments and Landfill

City Water, Light and Power (CWLP)

Springfield, Illinois



Prepared by:

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December 2023

Introduction

Pursuant to the requirements of 40 CFR Part 257.80(c) and in accordance with 40 CFR Part 257.105(g)(2), CWLP must prepare an Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report inclusive of the following information dating one year from the placement of the initial CCR Fugitive Dust Control Plan in its operating record. This Report includes:

- a. Description of actions taken to control CCR fugitive dust
- b. All citizen complaints
- c. Summary of corrective measures taken

Description of Actions Taken to Control CCR Fugitive Dust

- a) The paved roadway entrance to the facility was watered and/or swept as often as practicable to remove mud, dirt or similar debris. This is consistent with good engineering practice that consistently delivers satisfactory results, is a key component in the formal fugitive emission and control calculations as published by the EPA, and is congruent with requirements found in the facility's Title V federal operating permit.
- b) Fugitive dust emission reduction, roadway conditions, and employee safety concerns limited vehicle speed to 10 mph on all roadways inside the facility. EPA emissions factors correlate vehicular speed with dispersed particulates. This engineering control is adequate as demonstrated by past experience and is consistent with the approach used to obtain federal air permits at the facility.
- c) CCR storage piles maintained surface moisture sufficient to reduce wind-blown erosion and fugitive dust. Gypsum and ash have a moisture content of 10-20%. Industry-accepted methods for calculating fugitive particulate matter place great emphasis on the percent moisture of the material. With the moisture content so high given the nature of the product generation and transference, this is adequate to control fugitive emissions.
- d) Material handlers operating inside the facility exercised caution and care in CCR pile manipulation and loading procedures in order to minimize fugitive dust emissions. Good engineering practice to reduce the mechanical movement of CCR material with itself and with machinery demonstrates a commensurate reduction in fugitive dust.
- e) During high wind events, material handlers reduced or halted operations. Past experience has demonstrated that leaving piles undisturbed minimizes the possibility of entraining particulate material in the wind.
- f) All haul trucks carrying wet CCR material from the Dallman generating station into the facility were not covered and were not required to be so due to the natural surface moisture content of

the material. However, if the CCR material is handled dry in the future, then all haul trucks will be covered to reduce fugitive dust. Good practice and experience has shown that sheltering the CCR material from airflow generated by the vehicular transference of material greatly reduces the entrainment of particulates in to the atmosphere.

- g) In order to reduce roadway fugitive dust from the facility, a six-foot concrete barrier wall has been constructed on the southeast side of the facility as a preventative measure. This barrier dissuades the movement of windborne material to disperse over and collect upon the roadway surface.
- h) In addition to the constructed wall mentioned above, the natural growth of vegetation within and surrounding the facility served as a further control against roadway fugitive dust. Such an engineering practice is the industry standard for control as the aboveground fibrous vegetation creates a natural windbreak while the root system anchors the CCR material in place.

All Citizen Complaints

There have been no citizen complaints registered in reference to fugitive dust from the Dallman and Lakeside CCR Surface Impoundments and Landfill. A copy of the Fugitive Dust Citizen Complaint Log is below;

Fugitive Dust Citizen Complaint Log								
Complaint Background Details				Received Dust Event Details				Summary of corrective measures taken
Date Received	Time Revived	Name Provided	Contact Information	Date Observed	Time Observed	Source and Location Description	Comments/Other	
No Complaints								

Summary of Corrective Measures Taken

There have been no additional corrective measures taken; however, CWLP continues to execute fugitive dust management practices in accordance with the Fugitive Dust Control Plan.