



INDIANAPOLIS POWER & LIGHT COMPANY

EAGLE VALLEY SITE CCR FUGITIVE DUST CONTROL PLAN

Prepared for

Indianapolis Power & Light Company

Issue: For Use, Rev. 0

Date: October 12, 2015

Project No.: 10572-088

Prepared by



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CCR Fugitive Dust Control Plan
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ISSUE SUMMARY PAGE
CCR FUGITIVE DUST CONTROL PLAN
EAGLE VALLEY SITE
FOR
INDIANAPOLIS POWER & LIGHT COMPANY

<i>Purpose of Issue</i>	<i>Date</i>	<i>Pages Affected</i>
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FUGITIVE DUST CONTROL PLAN

EAGLE VALLEY SITE

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CERTIFICATION PAGE

I certify that this CCR fugitive dust control plan meets the requirements set forth in 40 CFR 257.80 was prepared by me, or under my direct supervision, and that I am a registered professional engineer under the laws of the State of Indiana.

Certified By: LM Illingworth Date: Oct. 12, 2015

Seal:





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A - Fugitive Dust Monitoring Report



EXECUTIVE SUMMARY

Indianapolis Power & Light Company (IPL) is committed to protecting the quality of the environment through feasible and effective measures. As one of these measures, IPL has prepared this Coal Combustion Residuals (CCR) Fugitive Dust Control Plan to minimize fugitive dust generated through its operations. This Fugitive Dust Control Plan was developed to meet the requirements of 40 CFR 257.80.

This CCR Fugitive Dust Control Plan is intended to apply to all employees and to all CCR operations activities which create fugitive dust at the Eagle Valley Site (EVS). Employees shall minimize fugitive dust generated on site and shall implement and follow this plan. Operations activities shall also be conducted in accordance with this plan.



1. INTRODUCTION

1.1 PURPOSE OF THIS PLAN

The purpose of this plan is to minimize Coal Combustion Residuals (CCR) from becoming airborne at the Eagle Valley Site (EVS). The primary sources of fugitive dust are listed in this plan. This Fugitive Dust Control Plan was developed to meet the requirements of 40 CFR 257.80.

1.2 STATION DESCRIPTION

EVS is located approximately five miles north of Martinsville in Morgan County, Indiana. The power station at the site began operation in 1949. The station consists of two oil-fired units (Units 1 and 2) and four coal-fired units (Units 3-6). Units 1 and 2 were retired in June, 2013. Units 3-6 are scheduled to retire in 2016 ahead of the April 16, 2016 deadline for compliance with the U.S. EPA Mercury and Air Toxics Standard (MATS) Rule. A new 650-MW natural gas-fired plant is being constructed adjacent to the retired units. The new plant is expected to begin commercial operation in April 2017.

The combustion byproducts of coal are bottom ash and fly ash. Units 3-6 use electrostatic precipitators (ESP) for particulate emissions control. Bottom ash and fly ash is sluiced from Units 3-6 into three on-site settling ponds (primary, secondary and final settling ponds). The sluiced ash is first piped to the primary settling pond. Larger material settles out in the primary settling pond. From the primary settling pond, water discharges to the secondary pond and to the final settling pond for additional settling.

EVS does not operate an on-site landfill for disposal of CCR material. Settling ponds have been used for disposal. Settling pond closure is scheduled to begin when Units 3-6 are retired in early 2016. The CCR fugitive dust plan described below applies to current operation of the coal-fired units.



1.3 SOURCES OF CCR FUGITIVE DUST

Primary sources of fugitive CCR dust at EVS are:

- a. Small spills of fly ash and bottom ash around piping and other equipment
- b. Equipment malfunction
- c. Dried out portions of the settling ponds
- d. Incidental CCR material on plant roads adjacent to the settling ponds



2. MONITORING

2.1 FREQUENCY OF MONITORING

Fugitive dust is monitored as part of normal plant operations.

2.2 MONITORING METHODS

For purposes of this fugitive dust control plan, fugitive dust is monitored visually. Action levels would be implemented as weather conditions, road conditions and source conditions warrant.

2.3 CONTROL MEASURES

The CCR handling equipment at EVS is designed to minimize CCR dust. The combustion byproducts of coal are bottom ash and fly ash. Bottom ash and fly ash is sluiced from Units 3-6 into on-site settling ponds. Sluicing reduces fugitive dust emissions from the ash. The ponds are designed such that the CCR material carried into the ponds settles to the bottom.

Evaporation at the edges of the settling ponds produces CCR material that may become airborne. Some of the CCR material may also settle on plant access roads adjacent to the ponds. Water sprays on those plant roads and adjacent edges of the ponds can be applied as necessary to control incidental fugitive dust emissions. Water sprays are suitable for a range of climate conditions, including warm humid conditions like those of central Indiana where EVS is located.

Frequent inspections of piping and other CCR handling equipment at the plant and routine preventive maintenance help to minimize CCR emissions.

Table 1 lists corrective measures applicable to the respective potential dust source. Some sources have multiple means of controlling dust, while other sources are controlled most effectively by a single method. In practice, some activities may require multiple measures at the same time. Application of these corrective measures is considered IPL's best effort to minimize fugitive dust at EVS.



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Table 1: Corrective Measures		
<u>Sources</u>	<u>Corrective Measure</u>	<u>Description</u>
Small spills of fly ash and bottom ash around piping and other equipment	1	Remove small fly ash spill
	2	Repair leak or other cause of the spill
Equipment malfunction	1	Repair equipment
	2	Reduce flows
Dried out portions of the settling ponds	1	Apply water as needed
Incidental CCR material on plant roads adjacent to the settling ponds	1	Apply water as needed



3. RECORDKEEPING

3.1 CONTENT OF RECORDS

The CCR Fugitive Dust Monitoring Report form (Appendix A) shall be completed when corrective measures are taken to reduce CCR fugitive dust over and above routine control measures. The completed reports shall serve as a record of visual monitoring and any control measures taken (to satisfy Final CCR Rule 257.80(b)(1)). It shall also serve as a means to assess the effectiveness of the dust control plan (Final CCR Rule 257.80(b)(4)). The report shall include:

- a. The date and local time of monitoring.
- b. Description of the fugitive dust source.
- c. The observer.
- d. Corrective actions taken and results of those actions. Depending upon the dust source, it may be necessary to apply multiple control measures.

The plant's existing environmental management system will be used to log citizen complaints and the corrective actions taken (Final CCR Rule 257.80(c)). Logged complaints will be placed in the annual CCR fugitive dust control report (Section 4.3).

3.2 RECORD STORING AND RETENTION

This plan is complete when it is placed in the station's operating record (Final CCR Rule 257.105(g)(1)). Within 30 days of placing the control plan in the station's operating record, it must be posted to the IPL CCR website (Final CCR Rule 257.107(d) and (g)(1)).

IPL will amend this written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as closing of a CCR unit (Final CCR Rule 257.80(b)(6)). The amended plan, when placed in the station's operating record, is considered the most recent control plan. Only the most recent control plan must be maintained in the station's operating record (Final CCR Rule 257.105(g)(1)). Similarly, the most recent dust control plan must also be maintained on the IPL CCR website (Final CCR Rule 257.107(g)(1)).



The completed CCR Fugitive Dust Monitoring Report forms will be kept for use in the annual CCR fugitive dust control report but are not required to be individually placed in the station's operating record.

Logged citizen complaints will be placed in the annual CCR fugitive dust control report. However, the logged complaints are not required to be individually placed in the station's operating record.



4. REPORTING

4.1 NOTIFICATION REQUIREMENTS

Within 30 days of placing this CCR fugitive dust control plan or future amendments and updates (Sections 4.3 and 5.3 below) in the station's operating record and on the IPL CCR website, IPL will notify the Indiana Department of Environmental Management (IDEM) that the document is available (Final CCR Rule 257.106(d) and (g)(1)).

4.2 CITIZEN COMPLAINTS

Citizen complaints involving CCR fugitive dust will be logged into an existing external communications log maintained by the plant that is part of the plant's environmental management system (Final CCR Rule 257.80(b)(3)). The log will use the existing environmental management system communications process. The log of citizen complaints will be kept for use in the annual CCR fugitive dust control report but is not required to be placed in the station's operating record.

4.3 ANNUAL CCR FUGITIVE DUST CONTROL REPORT

IPL will prepare an annual CCR fugitive dust control report that includes the following:

- a. A description of the actions taken to control CCR fugitive dust.
- b. A record of all citizen complaints
- c. A summary of corrective actions taken.

IPL will complete an initial annual fugitive dust control report no later than 14 months after placing the initial CCR fugitive dust control plan in the EVS operating record. The deadline for completing each subsequent report is one year after the date of completing the previous report. Each fugitive dust control report will be deemed complete when IPL has entered the report into the EVS operating record (Final CCR Rule 257.80(7)(c)). The annual fugitive dust control reports are placed on IPL's CCR website (Final CCR Rule 257.107(g)(2)).



5. QUALITY CONTROL

5.1 EVALUATING FUGITIVE DUST CONTROL PLAN EFFECTIVENESS

IPL will review and evaluate the effectiveness of this Fugitive Dust Control Plan (Final CCR Rule 257.80 (b)(4)). IPL will evaluate this plan by reviewing the CCR Fugitive Dust Monitoring Report forms periodically. Revisions to this plan will only be made with approval of IPL environmental staff.

5.2 FUGITIVE DUST CONTROL PLAN COMPLETION

The Final CCR Rule requires preparation of an initial CCR fugitive dust control plan by October 19, 2015. Per Final CCR Rule 257.80 (b)(5), IPL will place a copy of this plan into the EVS operating record and the initial plan will be deemed complete.

5.3 FUGITIVE DUST CONTROL PLAN AMMENDMENTS

IPL will revise this Fugitive Dust Control Plan when there is a significant change in operating conditions that would substantially affect this Plan (Final CCR Rule 257.80 (b)(6)).

5.4 PROFESSIONAL ENGINEER (PE) CERTIFICATION

IPL will obtain a certification from a qualified professional engineer that the Fugitive Dust Control Plan and subsequent amendments meet the air criteria requirements of Final CCR Rule (Final CCR Rule 257.80 (b)(7)).



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APPENDIX A

Fugitive Dust Monitoring Report

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