

**2019 Fugitive Dust Control Report  
IPL Petersburg Generating Station  
Petersburg, Indiana**

**Prepared For:**

Indianapolis Power & Light Company  
6925 N. State Road 57  
Petersburg, Indiana 47567

**Prepared by:**

ATC Group Services  
7988 Centerpoint Drive  
Indianapolis, Indiana 46256

December 6, 2019

December 6, 2019

Mr. Wil Teague  
Indianapolis Power & Light Company  
6925 N. State Road 57  
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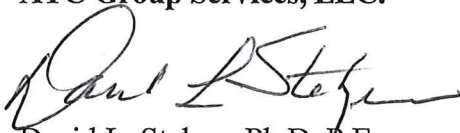
Re: **2019 Fugitive Dust Control Report  
IPL Petersburg Generating Station  
Petersburg, Indiana**


Dear Mr. Teague

On behalf of Indianapolis Power & Light Company (IPL), ATC Group Services LLC (ATC) is pleased to submit this 2019 Fugitive Dust Control Report for the IPL Petersburg Generating Station. This report was prepared to document the dust control measures, describe the effectiveness of these measures, and to identify any citizen complaints related to dust problems.

If you have any questions regarding this information, please contact our office.

Sincerely,  
ATC Group Services, LLC.

  
David L. Stelzer, Ph.D., P.E.  
Senior Project Engineer

  
Donald L. Bryenton, P.E.  
Principal Engineer

Copies: (3) Will Teague, IPL

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November 2019**

Prepared for: Indianapolis Power & Light Company, 6925 N. State Road 57, Petersburg, Indiana 47567  
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| A 2018 Fugitive Dust Monitoring Report                    |             |

# **2019 Fugitive Dust Control Report IPL Petersburg Generating Station Petersburg, Indiana December 2019**

## **1.0 INTRODUCTION**

### **1.1 PURPOSE OF THIS REPORT**

The purpose of this report is to document the incidents of fugitive dust and the actions taken to control the fugitive dust at the Petersburg Generating Station during 2018. The report has been prepared to meet the requirements of 40 CFR Part 257, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule April 17, 2015.

### **1.2 STATION DESCRIPTION**

The Petersburg Generating Station is located approximately 3 miles east-northeast of Petersburg in Pike County, Indiana. The generating station consists of four coal-fired units. Units 1, 3, and 4 are equipped with electrostatic precipitators (ESP) for particulate control. Unit 2 has a baghouse for particulate control. Each unit is equipped with a wet flue gas desulfurization (FGD) system for sulfur dioxide (SO<sub>2</sub>) control. Coal combustion residuals (CCR) waste product can go to an on-site landfill or an off-site facility. The majority of disposal is off site.

The combustion byproducts of coal are bottom ash, fly ash, and FGD waste. Bottom ash is sluiced to dewatering bins. Fly ash is conveyed via a dry ash handling system to storage silos. Depending on the quantity of fly ash, the fly ash may be loaded onto tanker trucks and enclosed trailers for beneficial use, or it may be loaded onto trucks and sent to an on-site landfill or an off-site facility. The wet FGD systems use limestone to reduce SO<sub>2</sub> and produce FGD byproduct. The FGD systems for Units 1, 2, and 4 produce gypsum, the majority of which is trucked off site for beneficial use. The FGD for Unit 3 produces byproduct that is mixed with fly ash, the majority of which is trucked off site for disposal.

### **1.3 SOURCES OF FUGITIVE DUST**

Primary sources of fugitive dust at the Petersburg Generating Station include:

- Small spills of fly ash and bottom ash around pipes and other equipment
- Equipment malfunction
- Small amounts of fly ash generated by unloading fly ash from silos into trucks and railcars
- Trucks carrying fly ash and FGD byproduct traveling on plant roads
- Trucks carrying fly ash and FGD byproduct depositing material in the landfill
- Active portions of CCR landfill
- Dried portions of the settling ponds

## **2.0 MONITORING**

### **2.1 FREQUENCY OF MONITORING**

Fugitive dust is monitored as part of normal plan operations.

### **2.2 MONITORING METHODS**

Fugitive dust is monitored visually. Action levels are implemented as weather conditions, road conditions, and source conditions warrant. Areas of the Petersburg Generating Station monitored include:

- FGD limestone and gypsum storage areas
- Material handling systems
- Plant roadways and parking areas
- Landfill
- Ash settling ponds

### **2.3 CONTROL MEASURES**

The CCR handling equipment is designed to minimize dust.

Bottom ash is sluiced with water and piped to dewatering bins. The sluice water facilitates bottom ash handling and reduces the amount of dust that may be generated. Dewatered bottom ash can be loaded onto trucks and sold to cement manufacturers for beneficial use.

Fly ash is conveyed via a dry handling system to storage silos. The conveyor system has enclosures installed at drop points on the system to reduce fugitive dust emissions. The fly ash silos employ baghouses to control fugitive dust emissions. The fly ash is conditioned with wet FGD byproduct and loaded onto trucks for transportation to an on-site landfill or offsite facility. Conditioning ash with wet FGD byproduct facilitates ash handling and reduces dust generation. Fly ash may be loaded onto tanker trucks or enclosed railcars for beneficial use. Transfer operations are monitored by station personnel to prevent or minimize fugitive dust emissions.

The wet FGD systems for Units 1, 2, and 4 produce gypsum which is stored in a covered building. The building reduces the amount of dust that may be generated. The majority of the gypsum is trucked off site for beneficial use. The FGD for Unit 3 produces byproduct that is used to condition the fly ash. The conditioned material is loaded onto trucks for transport to an on-site landfill or an off-site facility for disposal. The trucks are covered to reduce fugitive dust. The majority of the conditioned material is trucked off site for disposal.

The speed limit is 15 mph on plant roads and parking lots. Reduced speed limits at the site minimize fugitive dust. Inactive portions of the landfill have vegetative cover.

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

### **3.0 CONTROL OF FUGITIVE DUST**

Controlling fugitive dust at the Petersburg Generating Station is performed in accordance with the CCR Fugitive Dust Control Plan dated October 12, 2015.

Control measures such as watering, street sweeping, housekeeping, reduced speed limits, and covered trucks are used throughout the year to control fugitive dust.

### **4.0 RECORD OF CITIZEN COMPLAINTS**

There have been no citizen complaints in 2019 about fugitive dust.

### **5.0 SUMMARY OF ANY CORRECTIVE MEASURES TAKEN**

A fugitive dust monitoring report for 2019 is included in Appendix A. As stated in the Report, no fugitive dust crossed the property line during any of the events listed. The Report lists the description of fugitive dust source, the correction actions taken, and the results of the actions.

2019

| Fugitive Dust Monitoring Reports |      |                                     |               |   |
|----------------------------------|------|-------------------------------------|---------------|---|
| Date                             | Time | Description of fugitive dust source | Observer      | Corrective action taken and results of the action |
| 2/20/19                          | 0752 | Fly Ash Line in Fan Alley           | Art Rillo     | Repair Line                                       |
| 3/12/19                          | 0544 | " "                                 | Don Foley     | Replace Elbow                                     |
| 3/24/19                          | 0642 | Fly Ash Line                        | Joel McCallon | Replace Expansion Joint                           |
| 3/27/19                          | 0545 | U#3 Dry Tank Door                   | Andy Scott    | Replace Door                                      |
| 4/21/19                          | 1800 | Fly Ash Line                        | Roger Sattone | Repair Line                                       |
| 4/19/19                          | 0843 | " "                                 | Mike Gudlage  | " "   |
| 6/26/19                          | 0549 | " "                                 | Don Foley     | Replace Expansion Joint                           |
| 7/9/19                           | 0643 | Baghouse Conveying Ash System       | Joel McCallon | Replace Elbow (90°)                               |
| 8/15/19                          | 0529 | Common Fly Ash Line                 | Roger Sattone | Repair Line                                       |
| 8/19/19                          | 1542 | Unit #4 Fly Ash Line                | Jeff Hunter   | " "   |
| 9/1/19                           | 1739 | Unit #4 Fly Ash Line                | Don Foley     | " "   |
| 9/4/19                           | 1807 | Unit #2 Fly Ash Line                | Drew Bierman  | " "   |
| 9/6/19                           | 1741 | Unit #4 " "                         | Charles Sapp  | " "   |
| 10/2/19                          | 0810 | Unit #3 " "                         | Mike Gudlage  | " "   |
| 10/23/19                         | 1436 | " "                                 | Jeff Hunter   | " "   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |
|                                  |      |                                     |               |   |

No Fugitive Dust Crossed the Property Line During Any of the Above Listed Events