

ANNUAL CCR FUGITIVE DUST CONTROL REPORT
CONESVILLE PLANT

Prepared For:
CONESVILLE INDUSTRIAL PARK, LLC

Prepared By:
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COLUMBUS, OHIO

CEC Project 196-318

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Civil & Environmental Consultants, Inc.

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1.0 INTRODUCTION

This Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report (Annual Report) has been prepared for Conesville Industrial Park, LLC (CIP) pursuant to the air criteria of Title 40 Code of Federal Regulations (CFR), Part 257 (§257), Section §257.80 (CCR Rule). The Annual Report summarizes activities described in the (CCR) Fugitive Dust Control Plan (Plan) and includes the following components: description of actions taken to control CCR fugitive dust; a record of all citizen complaints; and a summary of any corrective measures taken.

This Annual Report addresses the period from January 1, 2021 to December 31, 2021. The Annual Report is deemed complete when it is placed in the facility's operating record as described in Section 6.0. The deadline for completing subsequent Annual Reports is one year after the date of completing the previous report.

The most recent Annual Report will be placed on the facility's CCR website titled at <https://conesvilleindustrialpark.com/ccr/> within 30 days of placing it in the operating record as described in Section 6.0.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 FACILITY INFORMATION

General Information:

Name of Facility: Conesville Industrial Park LLC - Conesville Plant

Street: 47201 County Road 273

City: Conesville

State: Ohio

Zip Code: 43811

County: Coshocton

Latitude: 40° 11' 6" N

Longitude: 81° 52' 47" W

2.2 CONTACT INFORMATION

Facility Operator:

Name: Conesville Industrial Park LLC - Conesville Plant

Attention: Pete Hartung – Project Manager

Street: 47201 County Road 273

City: Conesville

State: Ohio

Zip Code: 43811

Facility Owner:

Name: Conesville Industrial Park LLC - Conesville Plant

Attention: Dave Franjoine - President

Street: 500 Seneca Street, Suite 504

City: Buffalo

State: New York

Zip Code: 14204

Plan Contact:

Name: Jeff Wind – Environmental Compliance Manager (PEC)

Street: 47201 County Road 273

City: Conesville

State: Ohio

Zip Code: 43811

Mobile Telephone: (716) 713-5102

Facility Guard House:

Name: Conesville Industrial Park LLC - Conesville Plant

Street: 47201 County Road 273

City: Conesville

State: Ohio

Zip Code: 43811

Telephone: 716-713-5661

2.3 FACILITY DESCRIPTION

The Conesville Plant is located on the eastern shore of the Muskingum River at river mile marker 104.7 in Coshocton County, Conesville, Ohio. The Conesville Plant generating units were equipped with electrostatic precipitators (ESPs) that captured fly ash particles entrained in the combustion gases. The fly ash particles collected in hoppers at the base of the ESPs were either conveyed with water via piping to the Ash Pond Complex (APC) or pneumatically conveyed by pipeline to a dry storage silo when operating.

Units 4, 5 and 6 were dry bottom "type" boilers that produced a conventional bottom ash product. This material was conveyed (sluiced) with water through pipelines to the Bottom Ash Pond within the APC when operating.

The APC is divided into distinct areas by splitter dikes. The largest area of the APC is referred to as the Ash Pond, which consists of five ponds (designated as Ash Ponds 1 through 5) divided by internal dikes. This portion of the APC received fly ash and bottom ash sluice water. The internal dikes facilitated the re-routing of fly ash and bottom ash sluice water during times when maintenance dredging is required. The remaining area of the APC is designated as the Clear Water Pond. The Clear Water Pond receives the effluent from the Ash Pond and is subsequently conveyed to the Holding Pond for additional settlement prior to discharge to the Muskingum River. The Clear Water Pond and the Holding Pond are considered de minimis sources of air emissions and no further discussion is included in the Plan.

As stated previously, CIP will decommission the APC impoundment via closure by removal. The adjacent flue gas desulfurization (FGD) Landfill will also be removed entirely. However, the FGD Landfill was closed and capped in November 1988; and therefore, is not regulated as a §257 CCR unit. Fly ash and bottom ash that was placed within the APC impoundment and FGD material from the FGD Landfill will be excavated, transported by truck and placed at the State Route (SR) 83 Residual Waste Landfill (RSW) Landfill, the Five Points Abandoned Mine Lands (AML) Phase III Reclamation Areas, and the CCU Coal Refuse Area.

3.0 FUGITIVE DUST CONTROLS

The following fugitive dust control measures for the Excavation Areas, Placement Areas and Roadways described in the following sections of this Plan and were implemented during the period addressed by this Annual Report:

3.1 EXCAVATION AREAS

The fugitive dust control measures for site excavations, temporary stockpiling, and truck loading and hauling at the FGD Landfill and APC site will include taking precautionary measures to control fugitive dust generation. The control measures will include the following:

- Minimize the size of cut faces, terraces and/or excavation areas;
- Minimize the size and height of stockpiles;
- Minimize stockpile storage durations;
- Minimize cut face exposure time or watering exposed material as needed;
- Minimize drop heights;
- Compacting material as it is loaded; and
- Tarping trucks if necessary.

3.2 PLACEMENT AREAS

The fugitive dust control measures for material handling and placement at the SR83 RSW Landfill, Five Points AML Reclamation Areas and CCU Coal Refuse Area include taking precautionary measures to control fugitive dust generation. The control measures will include the following:

- Minimize the size and height of stockpile areas;
- Minimize stockpile storage durations;
- Minimize the working face area;
- Compact material as soon as possible;
- Minimize exposure time and watering exposed material as needed; and
- Minimize drop heights.

3.3 ROADWAYS

The applicable and adequate fugitive dust control measures for paved and unpaved roadways have been primarily selected in accordance with the applicable measures contained in the Conesville Plant Title V permit and Conesville SR83 RSW Landfill solid waste permit. Two public roads are crossed on the truck route to the SR83 RSW Landfill and these crossings are addressed as needed to minimize fugitive dust due to trucking activity.

Fugitive dust control measures for roadways are primarily: 1) watering; 2) speed controls; and 3) truck tarping when needed. Water trucks will be used as needed based upon daily observations and recordkeeping to minimize or eliminate emissions of fugitive dust generated by truck traffic. Speed limits are posted for paved and unpaved roads at the Conesville Plant and SR83 RSW Landfill. If truck loads are dry and generating fugitive dust, the trucks will be watered or tarped immediately. Material carried off plant property and deposited onto public highways by vehicular traffic or erosion by water will be promptly removed and disposed of properly to minimize or prevent resuspension. These control measures for SR83 RSW Landfill haul roads, which were taken from the Conesville Title V permit and Conesville SR83 RSW Landfill permit, are also applicable and adequate for the plant roadways used for transporting CCR. Implementation of control measures will not be necessary for roadways that are covered with snow and/or ice or if sufficient precipitation occurs to minimize or eliminate fugitive dust. Implementation of any control measures may be suspended if unsafe or hazardous driving conditions would be created by its use.

4.0 CITIZEN COMPLIANT LOG

4.1 PLAN CONTACTS

Generally, complaints made to the Conesville Plant are by telephone and received by the PEC (Plan Contact). In the case of holiday, weekends, or other times when the PEC may not be available, the plant guard house may receive complaint information by telephone that is provided in Section 3.0. Complaints may also be made to Ohio Environmental Protection Agency (EPA) who in turn will contact the PEC. **No dust complaints were received by the PEC during the period addressed by this Annual Report.**

4.2 FOLLOW-UP

All complaints will be entered into a log by the PEC with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be followed up which may include: reviewing inspection records, discussing with other CIP and contractor personnel, reviewing weather data, and contacting the person making the complaint to obtain additional information and determining the construction activity causing the complaint. **No dust complaint follow-up was necessary during the period addressed by this Annual Report.**

4.3 CORRECTIVE ACTION AND DOCUMENTATION

Corrective actions will be taken as needed and documented. If it is determined that the Plan needs to be amended as a result of the corrective actions, it will be amended in accordance with the Plan. If possible, the PEC will follow-up with the complainant and/or Ohio EPA to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the Annual Report. **No corrective actions due to dust complaints were necessary during the period addressed by this Annual Report.**

5.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended. **The PEC reviewed the inspection records when preparing this Annual Report to assess the effectiveness of the Plan and determined that no additional or modified measures were warranted.**

6.0 RECORDKEEPING, NOTIFICATION, AND INTERNET REQUIREMENTS

6.1 RECORDKEEPING

The Plan and files of all related information will be maintained in a written operating record at the facility for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, record or study. Files may be maintained on a computer or storage system accessible by a computer. The Plan (and any subsequent amendment of the Plan) and the Annual Report will be kept in the facility's operating record as they become available. Only the most recent Plan must be maintained in the record.

6.2 NOTIFICATION

The Director of the Ohio EPA and Ohio EPA-Southeast District Office (SEDO) will be notified within 30 days of when the Plan (or any subsequent amendment to the Plan) or the Annual Report is placed in the operating record and on the publicly available internet site. This notification will be made before the close of business on the day the notification is required to be completed. "Before the close of business day" means the notification must be postmarked or sent by e-mail. If the notification deadline falls on a weekend or federal holiday, the notification is automatically extended to the next business day.

6.3 INTERNET SITE REQUIREMENTS

The most recent Annual Report will be placed on the facility's CCR website titled at <https://conesvilleindustrialpark.com/ccr/> within 30 days of placing it in the operating record.