



CCR Fugitive Dust Control Plan

**Southern Indiana Gas and Electric Company
(SIGECO) / d.b.a. CenterPoint Energy
Indiana South (CEIS) F.B. Culley
Generating Station
East Ash Pond**

40 CFR 257.80 (b)

Version: 4.0



Revision Log

DATE	REVISION LEVEL	REVISION NOTES	APPROVER'S INITIALS
10/16/2015	1.0	Initial Plan	LCM
11/21/2018	2.0	Removed references to wet sluicing of dry fly ash.	ACS
04/18/2022	3.0	General Updates	JDM
06/03/2024	4.0	Updates for current EAP closure activity	JDM

Background

The F.B. Culley station utilizes a dry ash handling system for fly ash. When the system is unavailable due to equipment maintenance, fly ash is processed in the pug mill for preparation for transportation to a designated off-site disposal facility or beneficial use location. Unit 2 Bottom Ash is currently routed through geotextile tubes for the collection of the bottom ash then the filtrate is drained to a lined pond, while Unit 3 Bottom Ash is handled in a dry system and sent off-site for beneficial use or disposal. Gypsum is conveyed to a gypsum silo and loaded onto a barge via a covered conveyor system or loaded into trucks and shipped offsite for beneficial use. The East Ash Pond is currently undergoing closure-by-removal in accordance with the East Ash Pond Closure Plan submitted to IDEM dated February 11, 2022 and its subsequent amendments.

§257.80(b) 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.

This document outlines the plan that is utilized to control dust at the Coal Combustion Residuals Unit (East Ash Pond) at the F.B. Culley Generating Station, which is located near Yankeetown, Indiana. This plan identifies the procedures that will be utilized at the unit to ensure compliance with Section 257.80(b) of the CCR Rule, which requires the implementation of a dust control plan to minimize the potential for CCR to become airborne. This revision (Revision 4) reflects modifications to the plan based on current East Ash Pond Closure status. Closure of the East Ash Pond has been initiated and current site activities include dewatering, grading, CCR excavation and removal.

§257.80(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.

Fly ash is pneumatically transported within an enclosed system from the station to the dry fly ash silo onsite. From there the fly ash is loaded into trucks for transport to either the Dry Fly Ash Silo located in Evansville for loading onto a barge for transport to a beneficial user, or for transport to an off-site disposal facility or beneficial use location.

Bottom Ash from Unit 2 is routed through geotextile tubes for collection of the bottom ash then the filtrate is drained to a lined pond.. Bottom Ash from Unit 3 is handled via a submerged chain conveyor (dry) system and transported off-site for beneficial use or disposal. In areas where the ash is exposed, dusting may be controlled by operating a water spray or fogging system; using wind barriers, compaction, or vegetative covers; or through



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the use of a commercial dust control product (e.g., lignin-based materials, Soil-Sement, Eco-Flex, Eco Green Barrier, EcoBlend, Gorilla-Snot, TackDown, Mincryl X50, Steadfast, Pennz Suppress, Coconut Mats, etc.).

In the event that other products are found to be effective, SIGECO will modify the dust control plan to identify the new material.

Additionally, in the event that fugitive dust is observed, and/or when predicted weather conditions indicate that fugitive dust is likely, SIGECO will take special precautions to modify operations at the CCR unit to the extent practicable.

On days when cover materials are applied, a manager, someone designated by the manager, or an Environmental Affairs representative will record the following information:

- Date
- Name of Observer
- General weather conditions
- General location where fugitive dust was observed.
- Identification of approximate location of cover materials placed that day.

The East Ash Pond is currently in the closure process and CCR materials are actively being dewatered, excavated, staged, and removed from the site. As such, appropriate control measures are being implemented by the construction contractor. Inspections and operational observances are being implemented to actively assess the effectiveness of dust control measures. In the event that inspections and/or operational observances indicate additional dust control measures are warranted, these revised or additional control measures will be incorporated into an amended fugitive dust plan, as needed.

257.80(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.

Not applicable; the F.B. Culley facility does not have a CCR landfill.

257.80(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.

In the event citizen complaints regarding fugitive dust are received, those complaints will be logged, investigated, and responded to as appropriate. Complaints can be submitted via telephone or by sending an email to CCR_Inquiries@centerpointenergy.com.

257.80(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.

This fugitive dust control plan will be reviewed on at least an annual basis by CenterPoint Energy’s Environmental Affairs department. In addition to utilizing the operational procedures outlined in 257.80(b)(2), observations regarding fugitive dust are made by trained employees as required by the current Title V Air Permit.

257.80(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).

The initial plan was prepared and placed into the operating record no later than October 19, 2015. This revision (Revision 4) was prepared in May 2024 to address current closure activities.

257.80(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.

This plan has been updated based on the results of reviews of the plan’s effectiveness, when operational procedures warrant an update, or when another change in conditions warrant an update.

257.80(b)(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

I certify that this CCR Fugitive Dust Control Plan meets the requirements of 40 CFR §257.80(b).

Signature: Jay D. Mokotoff

Name: Jay D. Mokotoff, PE, PMP

Title: Associate Vice President

Certification Date: 06/03/2024

