



**Charles R. Lowman Power Plant
Leroy, AL**

CCR Fugitive Dust Control Plan

Revised October 16, 2015



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CCR Fugitive Dust Control Plan

Table of Contents

Engineer's Certification

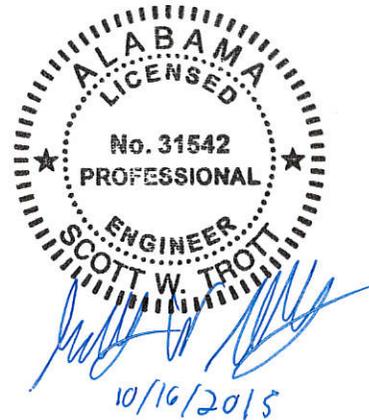
1.	Introduction	1
2.	Plan Objectives	1
3.	CCR Fugitive Dust Reduction Procedures.....	1
4.	Periodic Inspections	2
5.	Periodic Review	3
	5.1 Evaluation through Activity Review.....	3
	5.2 Evaluation through Public Input Review.....	3
6.	Revisions to the Plan.....	3
7.	Public Input	3
8.	Annual CCR Fugitive Dust Control Report.....	3
9.	Record Keeping.....	3

CCR Fugitive Dust Control Plan

Engineer's Certification

I certify that the CCR Fugitive Dust Control Plan presented herein meets the requirements of Section 257.80, subsets (a) through (d), of Title 40 of the Code of Federal Regulations as amended upon the date of this certification.

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CCR Fugitive Dust Control Plan

1. Introduction

The Charles R. Lowman Power Plant campus is located in Leroy, AL and is owned and operated by PowerSouth Energy Cooperative. The power generation facility is comprised of three coal fired generating units capable of producing 551 megawatts of power. The facility contains infrastructure for storing coal combustion residuals (CCR) including fly ash, bottom ash, and gypsum produced from flue gas desulfurization (FGD). Each material is unique and is managed to account for site conditions and the material's characteristics.

2. Plan Objectives

The CCR Fugitive Dust Control Plan (Plan) identifies PowerSouth's control measures and practices to minimize and control CCR products from becoming airborne at the facility in compliance with Section 257.80 of the CCR regulations. The plan defines the following:

- Potential sources for CCR fugitive dust emissions;
- Procedures to control CCR fugitive dust emissions;
- Procedures to receive and log citizen complaints received by the operator;
- Outline annual reporting requirements; and
- Record keeping practices.

3. CCR Fugitive Dust Reduction Procedures

Measures are utilized to limit the potential for CCR fugitive dust emissions from the defined sources. These control methods, outlined herein, are specific to the source and the best management practices for each area.

- **Storage Impoundments**

CCR is stored within specific impoundments present at the facility. Materials stored include gypsum fly ash, and bottom ash. CCR is stored within the impoundments with water incorporation as well as dry stacked.

- **Fly Ash Storage Silos**

Dry fly ash is stored in enclosed silos on site.

Storage Impoundments	
Control Measures	<ul style="list-style-type: none"> • Daily maintenance of water coverage and water incorporation for non-dry stacked CCR – CCR products stored within the impoundments and not dry stacked shall remain submerged or wet as may be required to prevent wind erosion. In wet ponds, water coverage levels and incorporation shall be inspected on a daily basis. • Stack height management for dry stacked CCR – Dry stacked CCR within the impoundments shall be maintained not to exceed twelve feet above the adjacent top of berm height where and when practical. • Surface-wetting of dry stacked CCR – Water shall be applied to the surface of the dry stacked CCR as needed to prevent wind erosion of the material. Frequency of water application will be responsive to site-specific conditions, with any areas more prone to dusting to be wetted more frequently.

Fly Ash Storage Silos	
Control Measures	<ul style="list-style-type: none"> • Limit fall height – The height at which the fly ash enters into the storage silo will be maintained at the minimum height practical. • Maintenance of Silo coverage – Storage silos shall remain closed when not actively being loaded or unloaded. • Materials level – The level of fly ash stored in the silos shall be maintained such that the silos are not overfilled. • Loading technique – Loading of material into transport vehicles so that material remains below the cargo compartment limits and that covers are properly in place as applicable.

4. Periodic Inspections

Periodic inspection activities will serve to monitor the effectiveness of the control plan and changes in conditions as they relate to each individual potential emission source as well as each control measure. An overview of the periodic inspection items are presented in Table 4.1.1.

Table 4.1.1
Inspection Items for Each Potential Emission Source

Potential Emission Source	Inspection Items
Storage Impoundments	<ul style="list-style-type: none"> • Visually inspect water coverage, incorporation, and need for surface application • Inspect height of stacked materials
Fly Ash Storage Silos	<ul style="list-style-type: none"> • Monitor for CCR dust outside of silo limits • Visually inspect to ensure that silos remain closed when not actively loading or unloading

5. Periodic Review

The Plan shall be evaluated as needed based upon both facility activity related to Plan components as well as through evaluation of public comment. Based upon these reviews as well as changing conditions or operations, Plan revisions may be initiated as needed.

5.1 Evaluation through Activity Review

Inspection logs shall be periodically reviewed to ensure that the prescribed control measures are effectively minimizing fugitive emissions.

5.2 Evaluation through Public Input Review

The Plan will also be evaluated for effectiveness by reviewing the public input received and logged.

6. Revisions to the Plan

The Plan shall serve as a living, flexible document to best reflect the needs of the facility. From time to time, conditions may exist which will require the Plan to be modified to be most applicable and effective. As an example, changes in facility operations at the facility may initiate the need for changes or a new potential emission source may be introduced. Additionally, certain modifications may be identified as being advantageous based on operational experience. The content and timing of plan revisions will be responsive to available information regarding the effectiveness of this Plan.

7. Public Input

Public input may be submitted through mail or phone. Public input shall be directed to PowerSouth Public Relations, as follows:

PowerSouth Energy Cooperative
ATTN: Public Relations
2027 East Three Notch Street
Andalusia, AL 36421
(334) 427-3000

8. Annual CCR Fugitive Dust Control Report

The Annual CCR Fugitive Dust Control Report (Annual Report) will be compiled each year to outline activities related to CCR fugitive dust control at the facility.

9. Record Keeping

Records of all activities related to CCR fugitive dust emission observation and management shall be logged and records shall be maintained in accordance with Section 257.80 of Title 40 of the Code of Federal Regulations.