



**SUNFLOWER ELECTRIC
POWER CORPORATION**

A Touchstone Energy® Cooperative 

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DUST CONTROL PLAN

**Sunflower Electric Power Corporation
Holcomb Station Unit #1
2440 Holcomb Lane / P.O. Box 430
Holcomb, KS 67851**

October 15, 2015

REVISION HISTORY

Revision Number	Revision Date	Section Revised	Summary of Revisions
00	10/15/2015		Original document

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LIST OF ACRONYMS

CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
EPRI	Electric Power Research Institute
FGD	Flue Gas Desulfurization

SECTION 1

BACKGROUND

The purpose of this Dust Control Plan is to identify and describe the Coal Combustion Residuals (CCR) fugitive dust control procedures used to reduce the potential for CCR becoming airborne at the Facility. The following sections provide background information on (1) coal combustion residuals and (2) regulatory requirements.

1.1 Coal Combustion Residuals

CCR materials are produced at coal-fired power plants when coal is burned to produce electricity. CCR materials are managed by coal-fired power plant sites, including on-site storage, processing (such as dewatering), and final disposal, typically in CCR landfills. Types of CCRs typically generated include fly ash, bottom ash, flue gas desulfurization (FGD) materials and other materials from the combustion process. General characteristics of these CCR materials are described below.

- **Fly Ash and FGD Materials** – Fly ash and FGD Materials are captured from exhaust (flue) gases by emissions control equipment including baghouses. FGD materials are produced by FGD emissions control systems, which are designed and operated to remove sulfur dioxide (SO₂) from exhaust (flue) gases. Fly ash is characterized by clay-sized and silt-sized fine grain materials, consisting of silica, calcium, alumina, iron and trace heavy metals. Due to the small particle size and consistency, fly ash can often be mobilized by windy conditions when it is dry. The fly ash generated at the Sunflower Electric Power Corporation / Holcomb Station facility in Holcomb, KS, has self-cementing properties in the presence of water. For this reason, a crust generally forms on its surfaces, reducing the potential for dust issues from fly ash storage areas.
- **Bottom Ash** – Bottom ash is characterized by sand-sized and gravel-sized materials, which settle by gravity to the bottom of a coal-fired furnace. Under certain conditions, the smaller-grained materials can be concentrated at the surface and be a potential source of dust issues.

1.2 Regulatory Requirements

This Dust Control Plan has been developed for the Sunflower Electric Power Corporation / Holcomb Station facility in accordance with applicable federal and state regulations, as discussed below.

1.2.1 CCR Rule Requirements

The CCR Rule (40 Code of Federal Regulations [CFR] Part 257, Subpart D) requires preparation of a Dust Control Plan for facilities including CCR landfills, and any lateral expansion of a CCR unit. Selected definitions from the CCR Rule are provided below.

CCR (coal combustion residuals) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

CCR fugitive dust means solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney.

CCR landfill means an area of land or an excavation that receives CCR and which is not a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground or surface coal mine, or a cave. For purposes of this subpart, a CCR landfill also includes sand and gravel pits and quarries that receive CCR, CCR piles, and any practice that does not meet the definition of a beneficial use of CCR.

CCR unit means any CCR landfill, CCR surface impoundment, or lateral expansion of a CCR unit, or a combination of more than one of these units, based on the context of the paragraph(s) in which it is used. This term includes both new and existing units, unless otherwise specified.

Qualified professional engineer means an individual who is licensed by a state as a Professional Engineer to practice one or more disciplines of engineering and who is qualified by education, technical knowledge and experience to make the specific technical certifications required under this subpart. Professional engineers making these certifications must be currently licensed in the state where the CCR unit(s) is located.

The CCR Rule requires owners or operators of these CCR facilities to adopt and document “measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities” (40 CFR 257.80). Existing CCR landfills must prepare a Dust Control Plan “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” (40 CFR 257.80 (b)(5)).

1.2.2 Applicable State Requirements

Sunflower Electric Power Corporation / Holcomb Station operates under Kansas State permit plan #420 for Holcomb Common Facilities, LLC.

SECTION 2

FACILITY INFORMATION

Name of Facility: Holcomb Station

Name of Operator: Sunflower Electric Power Corporation

Operator Mailing
Address: 2440 Holcomb Lane
PO Box 430
Holcomb, KS 67851
Attn: Environmental Compliance Supervisor

Location: North Half of Section 29, Township 24S, Range 33W

Facility Description: Holcomb Station operates (1) CCR industrial landfill called Holcomb Common Facilities, LLC. Holcomb has the only industrial landfill in the western part of the state.

SECTION 3

DUST CONTROL PROCEDURES

The following sections discuss dust control procedures for (1) CCR landfill units, and (2) facility roads. Sunflower Electric Power Corporation / Holcomb Station has implemented these dust control procedures, which are applicable and appropriate for site conditions in accordance with 40 CFR 257.80(b)(1).

3.1 CCR Landfill Units

CCR will be conditioned and placed into Holcomb Common Facilities, LLC industrial landfill in accordance with 40 CFR 257.80(a). Water will be added to the CCR materials to reduce any wind dispersal and improve compaction during CCR placement in landfill units. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent if necessary and with state approval. Compaction of CCR will be done to eliminate dusting in Holcomb Common Facilities, LLC industrial landfill.

The following additional dust control procedures are typically implemented for active CCR landfill units.

- Open or active landfill phase working face will be maintained as small as feasible. Inactive phases are identified by vegetative cover.
- Water spray or chemical dust suppressant is applied to the exposed CCR, including on the working face, as needed. Manual water spray or automatic sprinklers may be used. Chemical dust suppressant products include surface encrusting polymer emulsions.
- During high wind conditions, loading and unloading operations of trucks at the working face may be reduced or halted.

Following the installation, the final cap and cover, including vegetation, are maintained to reduce the potential for CCR becoming exposed to the atmosphere and dried.

3.2 Facility Roads

The following dust control procedures are implemented for roads in active use for CCR management activities at the Facility, or that are being traveled by construction equipment employed in CCR management activities.

- Reduced vehicle speeds will be implemented to reduce dust mobilization. During high wind conditions, operations and related traffic may be reduced or halted.
- Water or chemical agent will be added to CCR prior to transportation.
- During non-freezing weather, unpaved roads at the Facility are sprayed as needed using water trucks.
- During freezing weather, a solution of calcium chloride (or equivalent hygroscopic product) or other dust suppression agent could be applied on the unpaved roads. Hygroscopic materials attract moisture from the atmosphere and its surroundings, so unpaved surfaces will remain damp and fugitive dusting will be reduced during freezing weather.
- Non-essential traffic will be limited on the facility road to minimize dusting.

Trucks and vehicles that leave the plant site with CCR sold for beneficial use are required to be tarped per Sunflower Electric Power Corporation / Holcomb Station's contract.

SECTION 4

VISUAL OBSERVATIONS

Periodic visual observations are conducted by site personnel during the loading/unloading process to observe evidence of dust control, such as significant and visible fugitive dust emissions. Formal documented annual visual observations will be maintained at the Facility for five years.

SECTION 5

TRAINING

Training sessions are conducted annually to update employees on changes in the regulations, laws, or in-house procedures related to CCR management, including dust control procedures. Training records will be maintained at the Facility for five years. Sign-in sheets and topics of discussion at each briefing are maintained for documentation. Appendix A provides an example training attendance record.

SECTION 6

MANAGEMENT APPROVAL

This statement is the written commitment of the Sunflower Electric Power Corporation / Holcomb Station management to provide the resources required to effectively reduce the potential for CCR becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. This Dust Control Plan will be fully implemented as herein described, and the Dust Control Plan will be maintained in the Facility's operating record and on the Sunflower Electric Power Corporation / Holcomb Station publicly accessible internet site www.sunflower.net.

Signature: Steven W. Ricard
Steven W. Ricard (Oct 15, 2015)

Email: srCARD@sunflower.net

Name:

Date

Title: Executive Manager Generation

Date of full implementation: October 15, 2015

SECTION 7

ENGINEERING CERTIFICATION

Pursuant to 40 CFR 257.80 and by means of this certification, I attest that:

- (i) I am familiar with the requirements of the CCR Rule (40 CFR 257);
- (ii) I, or my agent, have visited and examined the Holcomb Station;
- (iii) the Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the CCR Rule; and the Dust Control Plan meets the requirements of 40 CFR 257.80.

Emily D. Vsetecka

Printed Name of Qualified Professional Engineer

Signature: 
Emily D. Vsetecka (Oct 15, 2015)

Email: evsetecka@sunflower.net

Signature of Qualified Professional Engineer

Registration/License No. 20380 State: Kansas

APPENDIX A

Training Attendance Record

APPENDIX A
HOLCOMB STATION
LANDFILL AND DUST CONTROL PLAN TRAINING
ATTENDANCE RECORD

INSTRUCTOR:	DATE:
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EMPLOYEE	JOB TITLE	SIGNATURE

NOTE: AFFIX A COPY OF THE MATERIALS USED FOR TRAINING, OR AN OUTLINE OF THE SUBJECT MATTER. MAINTAIN TRAINING ROSTER AND DOCUMENTATION WITH THIS PLAN.

APPENDIX B

Stakeholder Correspondence Records

SUNFLOWER ELECTRIC POWER CORPORATION / HOLCOMB STATION

Stakeholder Correspondence Record

Site name	<u>[Insert]</u>
Facility type	<u>[Insert]</u>
Facility location	<u>[Insert]</u>
Facility phone number	<u>[Insert]</u>
Time and date of correspondence	_____
Name of stakeholder	_____
Phone number for stakeholder	_____
Mailing address / email Address for stakeholder	_____ _____
Topic of correspondence (e.g., document question, concern, or observation)	_____ _____
Describe observed event, if applicable (include date/time, weather conditions, and any other information provided)	_____ _____ _____
Required Corrective Actions or Follow-up, if applicable	_____ _____ _____

Note: Attach additional sheets or correspondence, as applicable.

APPENDIX C

Annual Dust Control Reports

ANNUAL DUST CONTROL REPORT
SUNFLOWER ELECTRIC POWER CORPORATION / HOLCOMB STATION
[DATE]

Introduction

Sunflower Electric Power Corporation / Holcomb Station has prepared this Annual Dust Control Report in accordance with 40 CFR 257.80(c) to document the following information for the Sunflower Electric Power Corporation / Holcomb Station Facility located near Holcomb, KS:

- Description of dust control procedures implemented at Holcomb Common Facilities, LLC.
- Summary of any concerns raised by stakeholders
- Description of any corrective actions taken

Implementation of Dust Control Procedures

During the last [12 or 14] months, dust control procedures have been implemented at Holcomb Common Facilities, LLC as discussed in the Dust Control Plan, dated Month DD, YYYY. A copy of the current Dust Control Plan is available in the Facility operating record and on the Sunflower Electric Power Corporation / Holcomb Station internet site, as required by 40 CFR 257.105(g) and 257.107(g).

[If applicable, summarize any planned or recent deviations or revisions to the Dust Control Plan]

Stakeholder Correspondence

During the last [12 or 14] months, the following concerns or complaints have been received by Sunflower Electric Power Corporation / Holcomb Station:

- [insert, or state that no concerns or complaints were received]
- [redacted]

For each correspondence item, follow-up communications were completed, and records have been maintained by Sunflower Electric Power Corporation / Holcomb Station. If needed, corrective actions have been implemented as discussed below.

Corrective Actions

Based on inspections and/or stakeholder correspondence during the last [12 or 14] months, corrective actions [have/ have not] been identified to improve dust control at Sunflower Electric Power Corporation / Holcomb Station. A summary of corrective actions, including completion date or status, is provided below.

- [insert]
- [insert]

Closing

A copy of the most recent Annual Dust Control Report is available in the Facility operating record and on the Sunflower Electric Power Corporation / Holcomb Station internet site, as required by 40 CFR 257.105(g) and 257.107(g). The Sunflower Electric Power Corporation / Holcomb Station internet site also provides contact information and requests that stakeholders contact Sunflower Electric Power Corporation / Holcomb Station with any concerns regarding dust controls at the Facility.

APPENDIX D

HOLCOMB STATION

Dust Control Plan Review Documentation

APPENDIX D

**HOLCOMB STATION
DUST CONTROL PLAN REVIEW DOCUMENTATION**

This Dust Control Plan has been reviewed in accordance with 40 CFR 257.80(b) to assess if more effective control procedures are available to significantly reduce the likelihood of CCR from becoming airborne at the facility.

By means of this certification, I attest that I have completed a review and evaluation of this Dust Control Plan for the Facility located near Holcomb, KS, and as a result

_____ Will

_____ Will Not

amend the Dust Control Plan. Technical amendments to the Dust Control Plan have been certified by a Qualified Professional Engineer.

Signature, Authorized Facility Representative

Date

Name (Printed)

Title