



CCR Fugitive Dust Control Plan

WEC Temporary Ash Disposal Area



Public Power Generation Agency/
Hastings Utilities/City of Hastings, Nebraska

Gerald T. Whelan Energy Center

Hastings, Nebraska

August 6, 2021

Whelan Energy Center CCR Fugitive Dust Control Plan

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Attachments

Attachment 1: Facility Site Map

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Whelan Energy Center CCR Fugitive Dust Control Plan

Revision Log

This Coal Combustion Residuals (CCR) Fugitive Dust Control Plan may be revised from time to time when control measures or procedures are changed. Because revisions to this document can be made on a periodic basis, document control is necessary. The most recent version of this CCR Fugitive Dust Control Plan is required to be posted on the facility CCR website. The revision log below must be updated every time when this plan is amended.

Revision No.	Revision Date	Revised Sections	Originator	Notes
0	October 19, 2015	NA	HDR	Per CCR Rule
1	August 2021	All w/ primary revisions in Section 2	HDR	NDEE Title 132 permit renewal and major modification

Professional Engineer Certification

"I hereby certify that this CCR Fugitive Dust Control Plan for the Whelan Energy Center (WEC) operated by Hastings Utilities/City of Hastings, Nebraska meets the requirements of the Coal Combustion Residual (CCR) Rule 40 Code of Federal Regulations (CFR) §257.80(b) and that I am a duly licensed Professional Engineer under the laws of the State of Nebraska."

Print Name: Lori J. Calub

Signature: _____

Date: _____

License #: E-9881

My license renewal date is December 31, 2021.

1 Introduction

On April 17, 2015 the U.S. Environmental Protection Agency (EPA) published the final rule for the regulation and management of coal combustion residuals (CCR) under subtitle D of the Resource Conservation and Recovery Act (RCRA). The CCR rule defines a set of requirements for the disposal and handling of CCR in landfills and surface impoundments. One of the operating criteria for air, promulgated under Title 40 of the Code of Federal Regulations (CFR) §257.80(b), specifies that an owner or operator of a CCR landfill, surface impoundment, or lateral expansion of a CCR unit must develop a CCR fugitive dust control plan.

This plan is amended to address current operations and future known changes of the CCR unit.

1.1 Purpose

The CCR rule requires CCR surface impoundments and CCR landfills to develop a CCR fugitive dust control plan and adopt 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(a)). The plan must include:

- Identification of the CCR handling areas and control measures taken to minimize CCR fugitive dust at the facility
- Explanation of how dust control measures selected are applicable and appropriate for site conditions
- Emplacement of CCR in a landfill as conditioned CCR
- Procedures to log citizen complaints involving CCR fugitive dust events at the facility
- Description of procedures to periodically assess effectiveness of control plan

The initial plan was completed and placed in the facility operating record by October 19, 2015. Any subsequent plans, revised for changes in operations or site conditions, will be certified by a qualified professional engineer that the updated CCR fugitive dust control plan meets regulatory requirements. This plan will be posted to the Hastings Utilities/City of Hastings CCR website for the Gerald T. Whelan Energy Center (WEC). The Public Power Generation Agency (PPGA) will have a link on their website to the CCR website hosted by the City. A notification will be sent to the Director of the Nebraska Department of Environment and Energy (NDEE) of the availability of this CCR Fugitive Dust Control Plan.

The key definitions from the CCR Rule, 40 CFR §257.53, relative to the CCR fugitive dust requirements are:

“Coal combustion residuals (CCR)” 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 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.

“Facility” means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, disposing, or otherwise conducting solid waste management of CCR. A facility may consist of several treatment, storage, or disposal operation units (e.g., one or more landfills, surface impoundments, or combinations of them).

“Qualified person” means a person or persons trained to recognize specific appearances of structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit by visual observation and, if applicable, to monitor instrumentation.

“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.

1.2 Facility Background

The WEC is located two miles east of Hastings, Nebraska and currently has two (2) fossil fuel combustion units:

- WEC Unit No. 1 (WEC1) is owned by City of Hastings and operated by Hastings Utilities, the utilities department for the City of Hastings.
- WEC Unit No. 2 (WEC2) is owned by PPGA of which Hastings Utilities/City of Hastings (Hastings) is a partner and operating agent for PPGA.

Fossil fuel ash disposal at the WEC facility began in 1981, the same year that the WEC1 unit came online. The original construction of the WEC Temporary Ash Disposal Area was as a surface impoundment, which it continues to be until clean closure activities and retrofit of an area for a CCR landfill. CCR from both units are currently placed in this on-site WEC Temporary Ash Disposal Area as a CCR surface impoundment. The material stream that continues to go into the WEC Temporary Ash Disposal Area is fossil fuel bottom ash and fly ash mixture (pond ash) in sluice form from WEC1. Ash sluicing is anticipated to cease by October 2023.

Commercial operation of WEC2 began on May 1, 2011. Fly ash and scrubber ash from WEC2 are conveyed into silos for temporary storage; fly ash is normally direct loaded into trucks for off-site beneficial use and scrubber ash is moisture conditioned and hauled to the WEC Temporary Ash Disposal Area. WEC2 bottom ash is moistened and hauled to the WEC Temporary Ash Disposal Area.

Pond ash and scrubber ash are currently kept apart in the WEC Temporary Ash Disposal Area by an ash separation berm. The WEC Temporary Ash Disposal Area is located directly south of WEC1 and WEC2 in the NW quarter of Section 14, Township 7 North, Range 9 West of Adams

County, Nebraska. The WEC Temporary Ash Disposal Area (NDEE Permit No. NE0204129, Facility ID No. 58048), permitted with the Nebraska Department of Environment and Energy (NDEE), is currently approximately 23.2 acres.

Prior to October 2023, a portion of the existing WEC Temporary Ash Disposal Area will have existing CCR removed, base grade sampled, and retrofitted with a composite liner system for operation as a CCR landfill. Fossil fuel ash disposal utilizing the CCR landfill retrofit shall begin as soon as the liner construction is completed and approved by NDEE for CCR placement. The CCR landfill will receive CCR from WEC2 and is not a surface impoundment. Berms constructed around the perimeter of the landfill will define the landfill boundary. The retrofitted WEC Temporary Ash Disposal Area as a CCR landfill, permitted with the state of Nebraska, will be within the footprint of the initial phased closure of the existing CCR surface impoundment taking up approximately six (6) acres of the northeast corner.

2 CCR Fugitive Dust Control Measures

The WEC has several on-site structures and areas that are associated with CCR handling. The following sections specifically identify CCR generation areas, CCR handling operations, CCR transfer and emplacement, and the existing control measures to reduce CCR fugitive dust for the current operations as a CCR surface impoundment and for future operations as a CCR landfill. Fugitive dust may result from any of these areas. A facility site map in Attachment 1 illustrates these areas of CCR handling. The potential CCR fugitive dust sources and dust control measures are summarized in Table 1 and Table 2 to differentiate the measures taken for a surface impoundment and landfill, which are further described in the following sections.

Table 1 – WEC CCR Surface Impoundment Fugitive Dust Sources and Control Measures

Facility Component or CCR Source	Fugitive Dust Controls Currently in Place
Site Wide	• Site speed limit posted • Water truck on-site for dust control of piles and haul roads
WEC1 Fly and Bottom Ash	• Fly ash and bottom ash are sluiced from the plant and conveyed via pipe to the ash surface impoundment
WEC2 Bottom Ash	• Loaded indoors with all access doors closed when loading • Drop chute from submerged chain conveyor is present to help direct loading of the bottom ash into the back of dump trucks • Ash is loaded wet
WEC2 Fly Ash	• Dry ash is loaded from silo indoors (overhead doors normally open) • Drop chute jacket is present to help direct loading the dry ash into trailers • Dry ash is loaded into enclosed trailers for off-site use
WEC2 Scrubber Ash	• Ash is loaded moisture conditioned • Ash is loaded from silo indoors (overhead doors normally open) • Drop chute jacket is present to help direct loading of the ash into open-top trucks

Facility Component or CCR Source	Fugitive Dust Controls Currently in Place
CCR Surface Impoundment	• Fire hydrant/stationary sprayer used to spray stormwater from the leachate retention pond onto the excavated CCR and CCR stockpiles in the surface impoundment • Water truck used to control dust on access routes
CCR Loadout from Surface Impoundment	• CCR loaded into dump trucks or trailers within surface impoundment • All open trucks required to be covered with tarp before leaving site • Fire hydrant/stationary sprayer or water truck used as necessary to spray CCR immediately prior to loading into trucks

Table 2 – WEC CCR Landfill Fugitive Dust Sources and Control Measures

Facility Component or CCR Source	Fugitive Dust Controls Currently in Place
Site Wide	• Site speed limit posted • Water truck on-site for dust control of piles and haul roads
WEC2 Bottom Ash	• Loaded indoors with all access doors closed when loading • Drop chute from submerged chain conveyor is present to help direct loading of the bottom ash into the back of dump trucks • Ash is loaded wet
WEC2 Fly Ash	• Dry ash is loaded from silo indoors (overhead doors normally open) • Drop chute jacket is present to help direct loading of the dry ash into trailers • Dry ash is loaded into enclosed trailers for off-site use
WEC2 Scrubber Ash	• Ash is loaded moisture conditioned • Ash is loaded from silo indoors (overhead doors normally open) • Drop chute jacket is present to help direct loading of the ash into open-top trucks
CCR Landfill	• Water truck and/or fire hydrant/stationary sprayer used to control dust on access routes • Water from new leachate pond may be pumped and sprayed onto the CCR stockpiles • If needed, water truck may be used to control dust on CCR stockpiles
CCR Loadout from Landfill	• CCR loaded into dump trucks or trailers over lined landfill • All open trucks required to be covered with tarp before leaving site • Fire hydrant/stationary sprayer, water truck or water from new leachate pond used as necessary to spray CCR immediately prior to loading into trucks

2.1 Generation, Storage and Loadout of CCR

The CCR generated at the WEC is a mixture of bottom ash and fly ash (includes economizer ash) from WEC1, and bottom ash, fly ash, and scrubber ash from WEC2. Upon retrofit to CCR landfill and by October 2023, WEC1 will no longer be combusting coal and generating CCR.

2.1.1 WEC Unit 1

The fly ash from the WEC1 electric static precipitators, economizer ash, and bottom ash are conveyed within the plant building and pumped with water through a gravity pipe to the existing WEC Temporary Ash Disposal Area as a CCR surface impoundment. The CCR is enclosed from generation to loadout.

Occasional emergency clean-out of the electric static precipitator may cause CCR fugitive dust. The emergency clean-out occurs within the building, limiting the potential for fugitive dust generation.

2.1.2 WEC Unit 2

The bottom ash removal system collects, dewateres, and conveys bottom ash and furnace slag from the WEC2 bottom ash hopper via submerged chain conveyor to an open-top dump truck. Loadout occurs within the building. Hastings personnel haul the moistened bottom ash to the CCR unit for temporary storage. The CCR contractor or Hastings maintains the bottom ash stockpiles in the CCR unit prior to off-site beneficial use. Because the bottom ash is not subject to dusting, the material is considered conditioned when it is stockpiled and does not require additional dust control measures as the product is transferred from the generating units and placed into the CCR unit.

Fly ash is removed from the WEC2 electric static precipitator through a vacuum system to the fly ash silo for temporary storage. Fly ash is loaded into enclosed trucks for sale and off-site use of the material. The fly ash silo is equipped with a dustless unloading chute and a pneumatic unloader for loading enclosed trucks for potential sale of material. If WEC2 fly ash needs to be temporarily stored in the CCR unit, it will be loaded into a dump truck within the silo building.

Scrubber ash is removed from the WEC2 scrubber/baghouses through a pneumatic conveyor system to the WEC2 scrubber ash silo for temporary storage. Scrubber ash is moisture conditioned with a pug mill and directly loaded into open-top dump trucks for transport and stockpiling in the CCR unit. The moisture conditioning does not result in free liquids. The silo unloading occurs within a building (overhead doors normally in the open position) and the scrubber ash silo is equipped with a dustless unloading chute for primary dust control. The scrubber ash silo is also equipped with a pneumatic unloader for loading enclosed trucks for potential sale of materials.

2.2 Transportation of CCR

CCR fugitive dust can occur during transfer from the generation and temporary storage of CCR to the CCR unit. CCRs are sluiced to the existing CCR surface impoundment and transported in trucks on haul roads on-site from the WEC ash storage silos and bottom ash loadout area to the

active areas of the CCR unit. Fugitive dust may occur from CCR contained in open-top haul trucks or from miscellaneous CCR on the haul roads. Control of CCR fugitive dust during transportation will be accomplished by one or more of the following techniques:

- WEC1 fly ash and bottom ash is sluiced in liquid form through a gravity pipe to the CCR surface impoundment
 - WEC1 sluiced CCR will cease by October 2023.
- WEC2 moisture conditioning of CCR
 - Scrubber ash is moisture-conditioned during loading into open-top trucks for short haul to the CCR unit.
 - Bottom ash is sufficiently moist from the submerged chain conveyors and does not require any additional moisture before loading into a dump truck for short haul to the CCR unit.
- WEC2 dry fly ash is hauled in enclosed trucks by the CCR contractor with the lid closed prior to the truck leaving the property
- WEC2 dry fly ash may periodically require hauling to the CCR unit for temporary stockpiling; hauling should be coordinated with low wind days or load moisture conditioned, if needed, before leaving the silo building area
- On-site speed limit of 15 miles per hour (mph)
- Paved roads in the vicinity of the CCR silos
- Periodic sweeping of CCR from paved haul roads around CCR silos
- Watering haul roads, when needed

Water for fugitive dust control is obtained from the on-site, non-potable water supply well. CCR materials excavated out of the WEC Temporary Ash Disposal Area are loaded into open-top trucks for hauling off-site for beneficial uses. The trucks hauling pond ash or scrubber ash will be covered with some type of cover such as tarps prior to going off-site for CCR fugitive dust control. When the supply of fly ash exceeds market demand, WEC2 fly ash may be hauled to the CCR unit.

2.3 Temporary Disposal of CCR (Existing CCR Surface Impoundment)

The existing WEC Temporary Ash Disposal Area is located south of the generating units. CCR generated from the WEC is either sluiced in liquid form (WEC1 only) or offloaded from trucks and placed in the CCR surface impoundment in a moisture-conditioned state which controls CCR fugitive dust during unloading. Wet bottom ash is stockpiled within the limits of the CCR surface impoundment for future beneficial use. Moisture conditioned scrubber ash will be stockpiled in a stable condition. Potential CCR fugitive dust emissions may occur in the CCR surface impoundment at the following areas:

- Bottom ash stockpiles
- Scrubber ash unloading and stockpiles
- Excavation and stockpiling of CCR (i.e. pond ash)
- Loading of CCR into trucks for beneficial use
- Mobile equipment traveling across CCR surfaces
- Wind across dried CCR surfaces

The CCR fugitive dust control measures utilized at the WEC Temporary Ash Disposal Area include one (1) or more of the following:

- Receipt of sluiced fly ash/bottom ash from WEC1, moisture-conditioned scrubber ash, and de-watered bottom ash
- Spreading the scrubber ash to avoid stockpile peaks to be less conducive to wind erosion
- Watering of all areas of active equipment movement, when required
- Watering CCR stockpiles, when required
- Minimizing time between CCR excavation, stockpiling, and loading into trucks for beneficial use
- Minimizing the drop distance between the excavator/loader buckets of CCR and trucks

Water may be obtained from the on-site non-potable water supply well. Responsibility and control of watering at the dry CCR areas in the CCR surface impoundment is given to Hastings or the CCR contractor as it relates to their individual operations. A stationary sprayer is available as needed to control CCR dust generated by winds or by mobile equipment traffic on the CCR surface impoundment. The water spray will be limited to avoid accumulation of free liquids. Based on current conditions, and past experience, watering will occur for CCR fugitive dust control such that dust does not become airborne in quantities and concentrations to remain visible in the ambient air beyond the property boundary. During very windy conditions, the WEC Temporary Ash Disposal Area may be more frequently sprayed with water to control fugitive dust when necessary.

Hastings personnel will observe the WEC Temporary Ash Disposal Area for visible emissions of CCR fugitive dust on a weekly basis as part of the CCR surface impoundment weekly inspection. Personnel responsible for the weekly inspections will be trained on how to record and handle CCR fugitive dust observations. Personnel will log if there are visible emissions, along with the corrective actions taken, if applicable. If there are visible emissions the person will contact the CCR contractor or Hastings staff, as applicable, to apply control or corrective action measures to specified areas of the CCR surface impoundment.

As the CCR surface impoundment transfers into closure, the CCR fugitive dust control measures will continue to be implemented for the ongoing excavation and stockpiling of pond ash, and loadout of all CCR materials.

2.4 Temporary Disposal of CCR (Retrofitted CCR Landfill)

The retrofitted CCR landfill, WEC Temporary Ash Disposal Area as a CCR landfill, will be located south of the generating units within the northeast corner of the surface impoundment footprint as shown on the facility site map (Attachment 1). CCR generated from the WEC2 will be off loaded from trucks and placed in the CCR landfill in a moisture-conditioned state which controls CCR fugitive dust during unloading. Wet bottom ash will be stockpiled within the limits of the CCR landfill for future beneficial use. Moisture conditioned scrubber ash will be stockpiled in a stable condition.

Potential CCR fugitive dust emissions may occur in the CCR landfill at the following areas:

- Bottom ash stockpiles
- Scrubber ash unloading and stockpiles
- Fly ash stockpiling when temporary storage is needed
- Loading of CCR into trucks for beneficial use
- Mobile equipment traveling across CCR surfaces
- Wind across dried CCR surfaces

The CCR fugitive dust control measures to be utilized at the WEC Temporary Ash Disposal Area as a retrofitted CCR landfill include one or more of the following:

- Spreading the scrubber ash to avoid stockpile peaks to be less conducive to wind erosion
- Strategically constructing berms to act as wind breaks
- Watering of all areas of active equipment movement, when required
- Watering CCR stockpiles, when required
- Minimizing CCR movement during stockpile storage
- Minimizing the drop distance between the excavator/loader buckets of CCR and loading into trucks for beneficial use

Water may be obtained from the on-site non-potable water supply well. Responsibility and control of watering of the CCR stockpiles in the CCR landfill is given to Hastings or the CCR contractor as it relates to their individual operations. A water truck is available as needed to control CCR dust generated by winds or by mobile equipment traffic on the CCR landfill. Water may also be pumped from the leachate pond and used for dust control only over lined CCR landfill. The water spray will be limited to avoid accumulation of free liquids. Based on experience, watering will occur for CCR fugitive dust control such that dust does not become airborne in quantities and concentrations to remain visible in the ambient air beyond the property boundary. During very windy conditions, the access roads and CCR stockpiles may be more frequently sprayed with water to control fugitive dust when necessary.

Hastings personnel will observe the WEC Temporary Ash Disposal Area retrofit landfill for visible emissions of CCR fugitive dust on a weekly basis as part of the CCR landfill weekly inspection. Personnel responsible for the weekly inspections will be trained on how to record and handle CCR fugitive dust observations. Personnel will log if there are visible emissions, along with the corrective actions taken, if applicable. If there are visible emissions the person will contact the CCR contractor or Hastings staff, as applicable, to apply control or corrective action measures to specified areas of the CCR landfill.

3 CCR Rule Reporting and Recordkeeping Procedures

The CCR rule requires specific records and reporting for CCR fugitive dust control at facilities with CCR units. Hastings, as owner and operator of WEC1 and operator of WEC2, will take the lead on the procedures, reports, and recordkeeping for CCR fugitive dust as described in the following sections.

3.1 Citizen Complaints

Hastings procedures to receive and log citizen complaints involving CCR fugitive dust events at the facility include the following:

- Citizens can log a complaint on CCR fugitive dust by any one of the following methods:
 - Citizens can complete a standard on-line form for complaints on CCR fugitive dust. The form is provided on the City website (www.cityofhastings.org). The City of Hastings website includes the Hastings Utilities webpage which contains a link to the CCR Rule Compliance Data and Information.
 - Contact Hastings Utilities/City of Hastings (402) 463-1371. The person answering the call will complete the on-line form with the citizen providing the information.
 - Go in person to the Hastings Utilities administration building located at 1228 N. Denver Avenue, Hastings, NE 68901 during normal business hours Monday thru Friday from 8:00 am – 5:00 pm. A person at the reception area will complete the on-line form with the citizen providing the information.
- When the on-line form is completed and submitted by the citizen or the Hastings personnel completing the form on behalf of the citizen, CCR fugitive dust complaints will be directed to a designated City person(s). Complaints reported and received through the City's website will be automatically directed to the designated City person.
- Appropriate personnel will investigate the complaint.
- Any corrective actions taken will be documented.
- A record of citizen complaints and responses will be maintained in the appropriate files.

3.2 Periodic Assessments of Effectiveness of Control Plan

Hastings' procedures to periodically assess the effectiveness of this CCR Fugitive Dust Control Plan include the following:

- Review of the periodic visual observations for CCR fugitive dust and any actions taken
- Review of the citizen complaints and responses
- Results from the most recent annual CCR Fugitive Dust Control Report

Hastings will complete these reviews quarterly to assess the effectiveness of the control measures to mitigate CCR fugitive dust. The periodic assessment will be summarized and documented. If there are any improvements or additional control measures implemented, then these will be noted in the review documentation. This plan will be updated when any significant change in CCR fugitive dust control measures are implemented at the WEC.

3.3 Annual CCR Fugitive Dust Control Report

The CCR rule 40 CFR 257.80(c) requires preparation of an annual CCR Fugitive Dust Control Report that includes the following:

- Description of the actions taken by the owner or operator to control CCR fugitive dust
- Record of all citizen complaints
- Summary of any corrective measures taken

Annual reports have been completed since the initial report was placed in the facility's operating record. Subsequent annual reports must be completed within one (1) year after the date of completing the previous report. Completion means that the report has been placed in the facility's operating record.

3.4 Recordkeeping and Notifications

Records will include those required by the CCR rule and those performed as part of normal WEC operations relative to CCR fugitive dust control. Recordkeeping for CCR fugitive dust at the WEC existing CCR surface impoundment, and retrofitted CCR landfill will include the following plan and reports (as required by 40 CFR §257.80 and §257.105):

- CCR Fugitive Dust Control Plan and any amendment, and certification
- Annual CCR Fugitive Dust Control Report

Hastings, as owner and operator of WEC1 and operator of WEC2, will need to notify the NDEE Director within 30 days of placing the amended CCR Fugitive Dust Control Plan and annual reports in the operating record and posting to the CCR website (40 CFR §257.106 and §257.107).

The following records will be maintained by Hastings in the appropriate files in support of the CCR Fugitive Dust Control Plan and annual report:

- Record of citizen complaints
- Documentation of periodic assessments of effectiveness of control plan
- Actions or corrective measures taken to control CCR fugitive dust

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**Attachment 1
Facility Site Map**

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