Coal Combustion Residuals (CCR) Annual Fugitive Dust Control Report

PLANT NAME: William C. Gorgas Electric Generating Plant

OWNER/OPERATOR OF FACILITY: Alabama Power Company 600 North 18th Street; Birmingham, AL 35203

REPORTING TIMEFRAME: 10/20/2019-10/19/2020

PURPOSE: The purpose of this report is to demonstrate compliance with the requirements for the annual CCR fugitive dust control report in 40 CFR § 257.80 (c) of the Federal CCR Rule and ADEM Admin. Code r. 335-13-15-.05(7)(c). This report describes the actions taken by Plant Gorgas to control CCR fugitive dust, a record of all citizen complaints and if any, a summary of corrective measures taken.

DESCRIBE THE ACTIONS TAKEN TO CONTROL FUGITIVE DUST.

CCR material is not allowed to accumulate in CCR management areas. Dust accumulation and generation is prevented by washing down or vacuuming work areas, employing closed systems and covered trucks, wetting areas with vehicle traffic, and reducing speed of vehicles in active work areas.

CCR is conditioned using water as needed for placement, spreading and compaction at the CCR landfills – Bottom Ash Landfill, CCR Landfill, and Gypsum Landfill. Wetting is also employed as needed to control dust in areas of the landfills or work areas as indicated by routine inspections. Plant personnel may use other approved dust suppression agents to prevent dust generation if needed.

Plant personnel perform periodic CCR fugitive dust inspections. Based on these observations, the frequency, location and amount of dust suppression activities and processes is adjusted to prevent dust emissions. Plant personnel understand the importance of minimizing CCR fugitive dust generation and the requirement that any CCR fugitive dust observations should be promptly addressed.

Bottom Ash Landfill

The Bottom Ash Landfill has undergone closure, with a cover system in place. No fugitive dust controls are necessary.

CCB Landfill

Fugitive dust control measures include:

- 1. Water is applied to ash as needed during placement, spreading and compaction.
- 2. The exposed ash in the cells will be periodically covered with inert material.
- 3. Access to the landfill is restricted.
- 4. Speed of vehicles through active work areas is reduced.
- 5. Water is applied to the landfill when routine inspections indicate that additional dust control is necessary.

Gypsum Pond

Fugitive dust control measures include:

- 1. The Gypsum Pond is currently undergoing closure by removal. The pond is being dewatered and the ash is being excavated for beneficial use purposes.
- 2. Water is sprayed on areas as needed.
- 3. Trucks used to transport gypsum are covered.
- 4. Vehicle speed of heavy equipment through the Gypsum Pond is reduced.

Gypsum Landfill

Fugitive dust control measures include:

- 1. At the present time, CCR is not being disposed of in the Gypsum Landfill.
- 2. Water is sprayed on areas as needed.
- 3. Trucks used to transport gypsum are covered.
- 4. Vehicle speed of heavy equipment through the landfill active work areas is reduced.

Ash Pond

The Ash Pond is undergoing closure in place and some areas are still maintained in a wet condition that do not require other dust control measures. In areas where ash has been exposed or is dewatered, fugitive dust control measures in the ash pond area include the following:

- 1. Spraying dewatered ash with water using a water truck as needed to promote the formation of a surface "crust" and minimize the potential for fugitive dust generation.
- 2. Access to the CCR unit is minimized, allowing only necessary personnel to conduct closure construction activities along with construction monitoring, testing and inspections.
- 3. Plant and construction personnel conduct routine inspections for fugitive dust; plant CCR personnel are notified if fugitive dust generation is observed and action is taken.
- 4. Areas with observed fugitive dust are sprayed with water using water truck or other means.
- 5. Vehicle speed is limited. A speed limit sign is posted at each access road entrance to the CCR unit.
- 6. Disturbed areas in the Ash Pond are minimized to the extent possible to control erosion and minimize dust.

| HAS THE FACILITY RECEIVED ANY CCR FUGITIVE DUST CITIZEN COMPLAINTS WITHIN THE REPORTING | Yes | No |
|---|-----|----|
| TIMEFRAME? | | х |

IF YES, INCLUDE A RECORD OF ALL CITIZEN COMPLAINTS

| Date | Description of Complaint | Corrective Measures (If Any) |
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| Date | Description of Complaint | Corrective Measures (If Any) |
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