

FUGITIVE DUST CONTROL PLAN (40CFR Part 257.80)

LOCKWOOD ASH DISPOSAL SITE

Prepared on behalf of:

Lockwood Hills LLC
590 Plant Road, PO Box 187
Dresden, New York 14441

Prepared by:



2620 Grand Island Blvd.
Grand Island, New York 14072-2131

August 2019

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1 INTRODUCTION

Lockwood Hills LLC (Lockwood Hills) manages the Lockwood Ash Disposal Site (Lockwood or the Landfill), an ash monofill located in the Town of Torrey, Yates County, New York on Swarthout Road. Lockwood Hills maintains a 6 NYCRR Part 360 Solid Waste Management Facility permit (Permit No. 8-5736-00005/00003) for this facility issued by the New York State Department of Environmental Conservation (NYSDEC).

2 COMPLIANCE REQUIREMENT

An owner or operator of a coal combustion residuals (CCR) landfill must prepare a CCR fugitive dust control plan (Plan). Fugitive dust, as defined in the document, Compilation of Air Pollutant Factors (AP-42), U.S. Environmental Protection Agency, January 1995, is a discharge of material to the atmosphere and not in a confined flow stream such as a flue or stack. The Plan must describe the steps necessary to minimize CCR from becoming airborne at the facility, including fugitive CCR dust originating from CCR units, roads, and other CCR management and material handling activities. The written fugitive dust control plan must be consistent with the applicable requirements of 40CFR Part 257.80(b)(1) through (7).

The following minimum information is required:

- Identification of CCR fugitive dust control measures;
- CCR waste conditioning procedure;
- Description of citizen complaint logging;
- Description of how the Plan's effectiveness will be assessed; and
- A description of the required annual report contents.

The Plan will require revision if there is a change in conditions that would substantially affect the written plan in effect. In addition, the Plan will require revision if the assessment of the current plan indicates its effectiveness is unsatisfactory. Revised plans are not in effect until they are certified by a qualified professional engineer and placed in the operating record.

3 EVALUATION

3.1 FUGITIVE DUST CONTROL MEASURES

Fugitive dust control measures are to be practiced daily when the Landfill is operating. Such standard procedures include water truck usage on site roads and at the working face, roadway sweeping on paved roads, and imposing speed limits on vehicles to minimize kick-up of dust on on-site, unpaved roads. Trucks delivering waste to the facility will arrive tarped and remain tarped for as long as practicable before arriving at the Landfill working face to deposit its cargo. At the working face, waste trucks will be directed to deposit waste on a relatively flat area and not over any slope or drop off to minimize drop height. CCR waste will be spread, compacted and watered, if needed, to reduce any chance of fugitive dust. During periods of high winds, disposal operations may be suspended, and daily cover placed over the current disposal location if operations are shut down mid-day and the working face is in a wind-exposed location. Daily cover will consist of a minimum of three to six inches of soil or other alternate material approved by the NYSDEC. Depending on the dust source, application of multiple measures may be necessary.

Longer term measures for dust control include placement of interim cover over areas that will remain inactive for more than 30 calendar days. Interim cover consists of six to nine-inches of soil overlain by three to four-inches of soil suitable to sustain vegetative growth. The vegetative cover helps reduce erosion by surface runoff and protects the cover from damage and potential exposure of the CCR waste to becoming airborne. As areas reach final waste grades, the final cover system will be placed, further protecting the CCR waste.

3.2 CCR WASTE CONDITIONING

As required, a water sprayer will wet potentially dust-prone areas at the landfill site based on the weather conditions. This procedure prevents wind from picking up the dust particles and it helps with compaction. Also, when transporting CCR waste to the Landfill, wetting the ash in the mixer/unloader at the point of generation and covering the contents of the trucks with tarps or other

acceptable material, followed with a controlled filling plan and wetting the access roads, will be done to alleviate the fugitive dust.

3.3 CITIZEN COMPLAINT RECORDKEEPING

In accordance with §257.80(b)(3) of the Rule, this section outlines the procedure that Lockwood Hills will utilize to log citizen complaints involving fugitive dust events at the Landfill. The results of the investigation will be recorded on a complaint log and communicated to the appropriate parties. If the investigation confirms a fugitive dust emission event, Lockwood Hills will undertake an origin source investigation on the cause of the fugitive dust, they will develop a plan to remediate any impacts and prevent future incidences, as necessary. If a complaint is received, the name, local time, and a description of fugitive dust source will be recorded on the citizen complaint log included as Figure 3-1. Any actions taken to address the complaint will be added to the log entry.

Citizens wishing to make an observation of dusting conditions at the Landfill are directed to call 315-536-2359 and ask for the Engineer & Control Operator, who is responsible for the Landfill's environmental compliance.

FIGURE 3-1: CITIZEN COMPLAINT LOG

LOCKWOOD ASH DISPOSAL SITE CITIZEN COMPLAINT LOG

Date	Time	Citizen Information (Name, Address, Phone Number, Email	Summary of Complaint	Response Action Performed/Completion Date)	Complaint Received By

3.4 ASSESSMENT OF PLAN EFFECTIVENESS

Weekly Qualified Person inspections (Part 257.84(a)) include an assessment of fugitive dust conditions. This weekly assessment will describe any observed fugitive dust and its source, note corrective actions taken and document results of those actions. Annual Qualified Professional Engineer facility inspections (Part 257.84(b)) will include a review of these weekly inspections as well as an overall assessment of site conditions at the time of the inspection.

If there are any severe instances of fugitive dust events prompting complaints, this Plan will be reviewed at that time and modified as needed. If there is a chronic occurrence of minor events, such as only noted in the weekly inspections without offsite complaints, this Plan will be reviewed and modified as well.

In accordance with §257.80(b)(6), the Plan will be modified to add any new CCR units or to update information on any changes in the operation of the Landfill. The modified Plan will be reviewed and recertified by a registered professional engineer and will be placed in Lockwood's operating record as required per §257.105(g)(1).


3.5 ANNUAL REPORTING

In accordance with §257.80(c), the Landfill will prepare an annual fugitive dust control report that includes a description of actions taken to control CCR fugitive dust, a record of all citizen complaints, and a summary of any response actions taken. Moreover, the annual reports will be included in Lockwood Hills' operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the publicly accessible internet site per §257.107(g)(2).

4 CERTIFICATION

"I hereby certify that I have reviewed the dust control plan for the Lockwood Ash Landfill, located at the Lockwood Ash Disposal Site and owned and operated by Lockwood Hills LLC, and the requirements in federal regulation 40CFR Part 257 Subpart D - Standards for the Disposal of Coal Combustion Residuals (CCR) in Landfills and Surface Impoundments published April 17, 2015 and amended on March 15, 2018. The proposed dust control plan has been designed and constructed to meet the requirements specified for CCR units in 40CFR 257.80 – Air Criteria. Any future revisions or updates to this Plan will be certified and added to the facility’s operating record.”

I am a duly licensed professional engineer in the State of New York.



James A Daigler, P.E.



NYSPE LIC # 061689

5 REFERENCES

Federal Register Supplementary Information, C.VI.K.2., April 17, 2015, pp 21386-21389.

Operation & Maintenance (O&M) Manual – Lockwood Ash Disposal Site, prepared by Daigler Engineering, P.C., revised March 2018.