



## FUGITIVE DUST CONTROL PLAN

### FORMER FRANK E. RATTS GENERATING STATION

NOVEMBER 8, 2024

## Former Frank E. Ratts Generating Station Fugitive Dust Control Plan

**Initial Development Date:** 11/4/2024      **Developed By:** Environmental Services  
**Revision Number:** 0      **Revision Date:** \_\_\_\_\_

### 1.0 Scope

- 1.1 This plan is designed to minimize fugitive dust at the Hoosier Energy Rural Electric Cooperative's (Hoosier) former Frank E. Ratts Generating Station (Ratts) coal combustion residual surface impoundments and landfill (CCR Units). The plan also describes actions that can be taken to control fugitive dust. It contains provisions for citizen complaints and annual reporting as well.

### 2.0 References

- 2.1 40 CFR 257.80 Air Criteria

### 3.0 Procedure

- 3.1 **Minimize disturbing the surfaces of the CCR units:** Currently the onsite CCR Units have vegetative cover on most surfaces. This helps prevent CCR from becoming airborne. Driving on or otherwise disturbing the surface raises the potential for CCR to become airborne. Therefore, driving on the CCR Units should be minimized. When necessary to drive on the CCR Unit, one should reduce speed to minimize CCR from becoming airborne.
- 3.2 **Use water spray during operations.** During periods when activities must take place on a CCR Unit, water will be sprayed on exposed CCR as necessary to control fugitive dust. Descriptions of the general use of the water truck will be recorded on the project supervisor's daily report.
- 3.3 **Use of Alternative Cover (AC) should be considered as necessary.** Should the use of a water truck not be sufficient to control fugitive dust, or if a longer-term dust control method is needed, alternative cover (AC) can be applied to the CCR. Short-term AC products will generally include water-based products such as lignin-based materials. These products are effective for up to three months if undisturbed by rainfall or traffic. Use of AC should be noted on the periodic inspection report and the project supervisor's daily report, if applicable.
- 3.4 **Long-Term Alternative Cover (LAC) can be considered if other methods are not sufficient.** Long-Term Alternative Cover products include materials such as EcoFlex and SoilSement that can provide cover for up to six months or longer.
- 3.5 **Emplacement of Conditioned CCR:** This provision is not applicable because the facility no longer generates CCR and the landfill at the facility no longer receives CCR.

- 3.6 **Periodic fugitive dust control inspection:** As part of the periodic inspection, site conditions will be noted including fugitive dust and the potential for fugitive dust.
- 3.7 **Citizen complaints:** Citizen complaints regarding fugitive dust can be reported through the Contact Us link on the company's CCR Compliance website. Information gathered should include name and contact information for the complainant, the date and time of the observation, and the area(s) being impacted. After investigating, a representative from Hoosier will contact the complainant to inform them of the remedial actions being taken if necessary.
- 3.8 **Annual Fugitive Dust Control Report:** Hoosier will prepare an annual CCR Fugitive Dust Control Report that includes a description of the actions taken to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The report should also assess the effectiveness of the control plan. This report will be placed in the facility's operating record and posted on the company's CCR Compliance website, and the Indiana Department of Environmental Management will be notified as to its availability online.
- 3.9 **Certification by a qualified professional engineer:** This plan shall be certified by a qualified professional engineer.



11/04/2024