CCR FUGITIVE DUST CONTROL PLAN

CANADYS POWER STATION COLLETON AND DORCHESTER COUNTIES SOUTH CAROLINA

Prepared For:

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CEC Project No. 343-374

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1.0 PURPOSE

On behalf of Dominion Energy South Carolina, Inc. (DESC), Civil & Environmental Consultants, Inc. has prepared this CCR Fugitive Dust Control Plan for the former Canadys Power Station (Canadys Station) located at 13139 Augusta Highway, Walterboro, South Carolina. As a result of past coal-fired electric power generation at the site, coal combustion residual (CCR) material is present in two surface impoundments at the site. These two surface impoundments are defined as Legacy CCR Surface Impoundments (LSI) under the Legacy CCR Rule published in the Federal Register on May 8, 2024, and effective November 8, 2024.

The purpose of the Fugitive Dust Control Plan (FDCP) is to describe the procedures used to reduce the potential for CCR to become airborne at the site. Activities at the site are anticipated to include removal of CCR from Ash Pond 1 and 2, handling CCR within the site limits of removal and loading areas, and transport on internal haul roads to public roads. A figure showing the facility and locations of Ash Pond 1 and 2 is presented in Appendix A.

2.0 RELEVANT REQUIREMENTS

Requirements for this CCR Fugitive Dust Control Plan are contained in §257.80(b)(1) through (4) and include.

- Identify and describe the CCR fugitive dust control measures.
- Procedures to log citizen complaints.
- Procedures for periodically assessing the effectiveness of the plan.

Other relevant requirements from 40 CFR 257 are summarized below.

| Rule Citation | Requirement Description |
|----------------|--|
| §257.105(g)(1) | Placement of FDCP in the CCR operating record |
| §257.80(c) | Preparation of an annual CCR FDC Report |
| §257.105(g)(2) | Placement of the annual CCR FDC Report in the CCR operating record |
| §257.106(g)(1) | Notification of the availability of the FDCP |
| §257.106(g)(2) | Notification of the availability of the annual CCR FDC Report |
| §257.107(g)(1) | Placement of the FDCP on the publicly available internet site |
| §257.107(g)(2) | Placement of the annual CCR FDC Report on the publicly available internet site |

3.0 DUST CONTROL PROCEDURES

Specific control measures for the following two types of site areas are described in the following subsections:

- Surface impoundments containing CCR; and
- Onsite roads;

3.1 SURFACE IMPOUNDMENTS CONTAINING CCR

Ponds containing CCR consist of Ash Pond 1 and Ash Pond 2, which are located north of the Edisto River in Dorchester County. During closure of these ponds, CCR will be excavated and hauled off-site for disposal in a permitted landfill or beneficiated. In addition to excavation, moisture conditioning, screening/sizing, and truck loading will also be performed within the limits of Ash Ponds 1 and 2. Moisture-conditioned CCR will be loaded into highway haul trucks. Loaded trucks will be covered with tarps prior to leaving the loading area. The selected construction contractor will install control mechanisms to remove ash from the truck wheels prior to the trucks exiting the facility. Potential controls include a wheel wash well, spray wheel wash, shaker rack, and/or trackout mat.

The following dust control procedures will be implemented in active closure areas:

- The extents of exposed CCR will be minimized to reduce the area exposed to wind.
- Excavated CCR will be moisture conditioned as needed so it is not too wet to be hauled offsite nor too dry so as to become airborne.
- Surfaces that are potential fugitive dust sources (e.g., gravel haul roads) will be wetted using an onsite water truck.
- Haul roads will be inspected daily for dropped CCR material which will be removed to prevent it from becoming airborne with truck traffic.
- An appropriate vehicle speed limit will be enforced within the closure areas to reduce dust mobilization.
- Highway haul trucks will have fully functioning locking and sealing tailgates to prevent spillage.
- Highway haul trucks will have tarps to cover the CCR loaded into the truck body.
- A wheel wash station will be maintained where it can be drained or pumped into Ash Pond 1 or 2.

- Highway haul trucks will not leave the site until their exteriors have been cleaned of CCR
 and soil, tailgates have been locked, tarps have been secured over the body of the truck,
 and they have passed through the installed trackout control.
- During high winds, additional measures will be implemented as needed, such as halting loading and hauling operations until winds subside.

3.2 ONSITE ROADS

The following dust control procedures will be implemented for roads at the Canadys Station that are traveled by construction equipment and/or haul vehicles.

- Appropriate speed limits will be enforced for paved and unpaved roads to reduce dust mobilization.
- Highway haul trucks will be tarped and will have locked and sealed tailgates.
- Paved and unpaved onsite roads traveled by construction equipment and/or haul vehicles will be sprayed by water trucks as needed to suppress dust mobilization.
- Paved roads will also be swept as needed to remove dust producing materials.
- During high wind conditions, hauling operations may be suspended and additional dust suppression measures may be implemented.

3.3 RATIONALE FOR SELECTED CONTROL MEASURES

The site is located in a temperate climate and has reliable water sources. The site has monthly average wind speeds approximately ranging from 5 to 8 miles per hour. Therefore, the selected control measures consisting of watering exposed CCR and haul roads, limiting traffic to defined routes with limited speeds, limiting work during windy periods, and limiting the extent of exposed CCR are all industry accepted control measures for this site.

4.0 PROCEDURES FOR RESPONDING TO CITIZEN COMPLAINTS

In accordance with §257.80(b)(3), this plan includes procedures to log citizen complaints involving CCR fugitive dust events. Citizen complaints will be documented on the Dust Complaint Log (Appendix C) and investigated. The name of the person making the inquiry, contact information, and the nature of the inquiry shall be recorded, if made available. It is anticipated that such complaints would normally be received via contact information provided on the permanent marker for the units located on the fence at the entrance to the LSIs. A record of all citizen complaints involving fugitive dust during each annual reporting period will be included in the Annual CCR Fugitive Dust Control Report for that annual reporting period. Each annual report will also include a summary of any corrective measures taken.

5.0 ASSESSMENT OF EFFECTIVENESS

In accordance with §257.80(b)(4), the owner/operator will periodically assess the effectiveness of this plan. The assessment will be performed during the preparation of each Annual Fugitive Dust Control Report and will consist of soliciting evaluations of dust control effectiveness from onsite personnel and reviewing 7-day inspections and citizen complaint reports. Each assessment will conclude either that dust control operations have been effective or that corrective measures and/or plan amendments are needed. Plan amendments will be tracked in the Revision History in Appendix B.

6.0 RECORDKEEPING AND REVISIONS

The requirement for completing the Annual CCR Fugitive Dust Control Report is satisfied when the Report has been placed in the facility's operating record as required by §257.105(g)(2) of the CCR rule. The following records will be kept and incorporated into the Annual Fugitive Dust Control Reports:

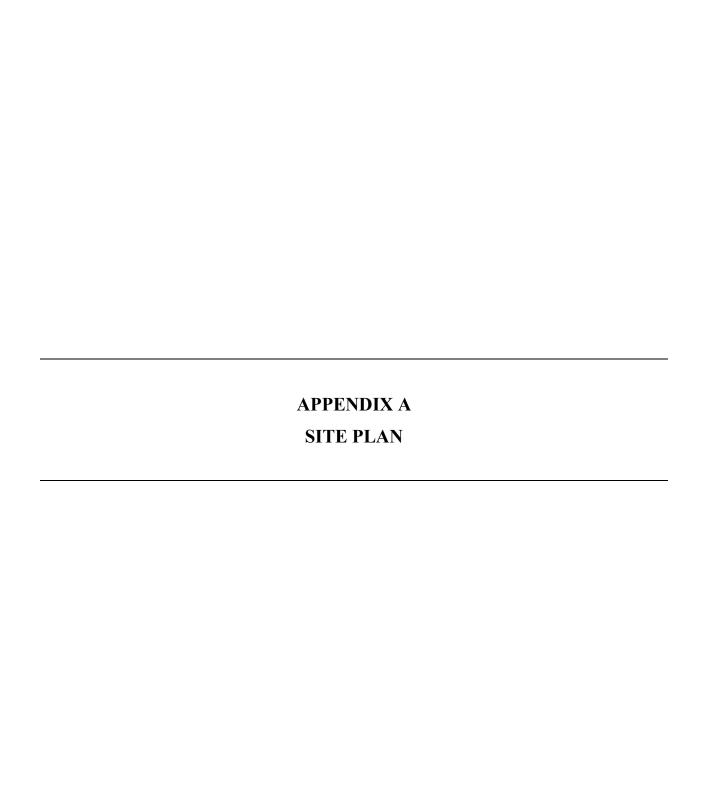
- Citizen complaints;
- Evaluation of plan effectiveness; and
- Corrective actions in response to inspections and citizen complaints.

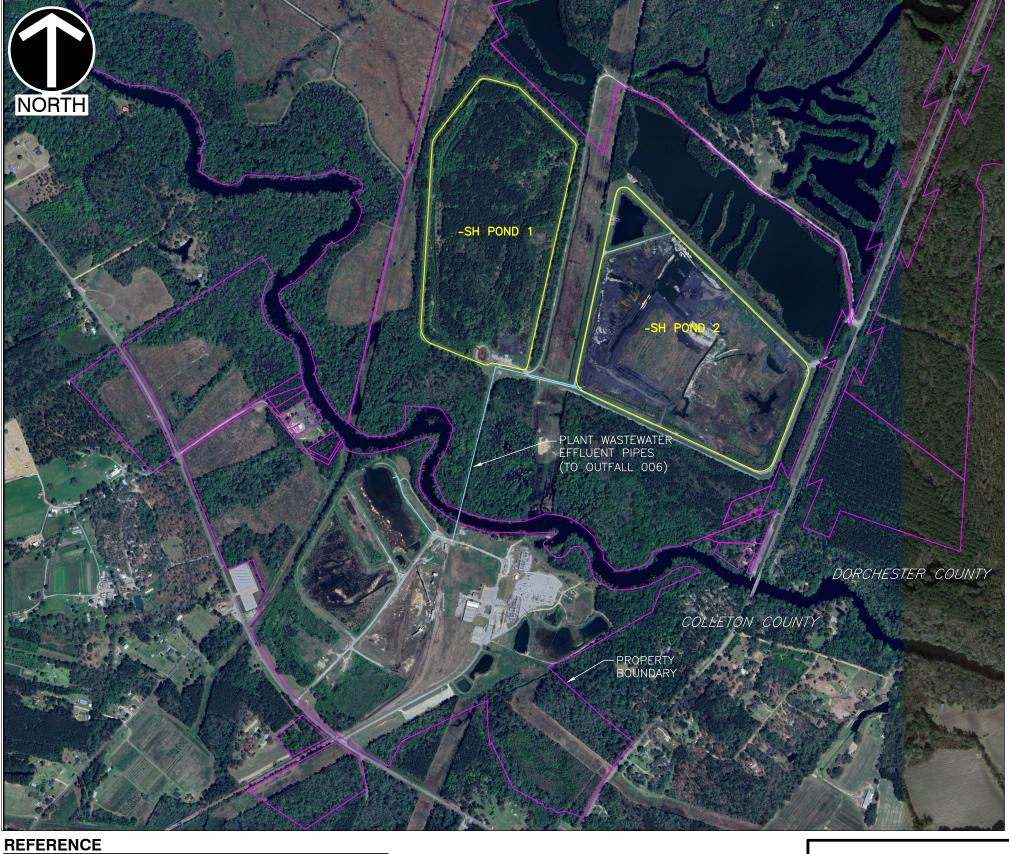
In accordance with §257.80(b)(6), DESC may amend this plan at any time provided that the revised plan is placed in the operating record. This plan must be amended whenever there is a change in conditions that would substantially affect the written plan. In addition to being placed in the operating record, a copy of the plan will be maintained at the site during CCR removal activities.

As required by §257.107(g), the following documents will be posted on the facility's public CCR website:

- The most recent CCR Fugitive Dust Control Plan; and
- The Annual CCR Fugitive Dust Control Reports.

The current Fugitive Dust Control Plan (or Plan Amendment) and Annual CCR Fugitive Dust Control Report must be maintained in the Station's operating record. Dominion Energy must notify the Director of the SCDES when these documents have been placed in the operating record and on the Station's publicly accessible internet site in accordance with the CCR rule.







- -ERI-L PHOTO T-KEN FROM GOOGLE E-RTH PRO, IM-GE D-TED -PRIL 10, 2023.
- DOMINION ENERGY PROPERTY BOUND-RIES OBT-INED FROM COLLETON COUNTY -ND DORCHESTER COUNTY GIS ON -UGUST 2, 2024.
- POND OUTLINES B-SED ON FIGURE 2, "F-CILITY L-YOUT & FE-TURES" FROM "CLOSURE PL-N FOR THE C-N-DYS ST-TION SOUTHWEST DISPOS-L -RE- & FORMER CO-L PILE" BY G-RRETT & MOORE D-TED OCTOBER 2020.



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DOMINION ENERGY SOUTH CAROLINA FUGUTIVE DUST CONTROL PLAN

SCALE IN FEET

1000

CANADYS STATION, SOUTH CAROLINA

SITE PLAN

RB FIGURE NO.: DRAWN BY: BML CHECKED BY: TBM APPROVED BY: NOVEMBER 2024 DWG SCALE: 1"=1000' PROJECT NO: 343-374 DATE:

| APPENDIX B |
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| REVISION HISTORY |
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REVISION HISTORY

| Revision No. | Date | Description of Revision |
|--------------|-----------|-------------------------|
| 0 | 11/1/2024 | Original |
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Fugitive Dust Complaint Form

| Date: |
|---|
| Time: |
| Reference Number: |
| Surveyor: |
| Weather Conditions: |
| |
| Approximate Location/ Distribution of Dust: |
| |
| Dust Description: |
| |
| Suspected Source: |
| |
| Actions Taken: |
| |
| Additional Comments: |