CCR FUGITIVE DUST CONTROL PLAN **October 13, 2015**
WESTON DISPOSAL SITE NO. 3 EXPANSION

1.0 INTRODUCTION

The Weston Disposal Site No.3 Expansion (WDS#3) landfill is used for the disposal of coal combustion residuals (CCR) from Wisconsin Public Service Corporation's (WPSC) Weston units 3 & 4 and Pulliam units 7 & 8. This landfill is permitted by the Wisconsin Department of Natural Resources under license number 3067. WPSC owns approximately 200 acres with 56.7 acres permitted for CCR disposal within the Town of Knowlton, Marathon County, Wisconsin.

This fugitive dust control plan has been prepared to meet the requirements of 40 CFR 257.80(b). Cells 1 and 2 are an Existing CCR Landfill as defined in 40 CFR 257.53.

2.0 FUGITIVE DUST CONTROL MEASURES

CCR Management: WDS#3 is designed and operated to have filling areas at different elevations to assist in the prevention of windblown dust during adverse weather conditions. In general, CCR is deposited in the designated active area of the cell, spread, and compacted to prevent fugitive dust generation. The location of the active area can be adjusted by site personnel based on weather and wind conditions with the objective of depositing CCR at locations where dust generation is least susceptible.

All CCR delivered to WDS#3 are conditioned with water at the source prior to transporting the materials to the facility. Water is added to the CCR at the source in sufficient quantities such that the CCR is not dusty during transport or delivery. Trucks delivering CCR to the facility are required to be covered. CCR will also be conditioned at the source as necessary to the extent that the delivered CCR does not contain free water.

At WSD#3 the CCR is discharged from the trucks in the designated active area of the cell. The newly deposited material is graded, conditioned with additional water or leachate, if necessary, and compacted. Dust suppression within the active cell will be maintained by moisture conditioning, grooming and compaction of CCR. The generation of windborne fugitive dust is effectively minimized by regularly wetting exposed CCR surfaces with a water truck.

In areas of the landfill that are not being filled or are inactive, soil stabilization/dust control products may be applied as necessary to help reduce the potential for windblown CCR. The selected soil stabilization/dust control product is applied and maintained in accordance with the manufacturers' recommendations. Additional measures may also be considered including but not limited to the placement of bottom ash, installation of temporary geomembrane or geotextile covers, erosion control fabrics/mulch matting, hydro mulch, or temporary soil covers with or without vegetation. Sections of final cover are installed after final CCR grades are achieved over a sufficient area to support a practical final cover installation work scope.

Access Roads: To minimize CCR track-out onto the access road, a stone tracking pad, a wheel wash station and/or a cattle guard will be used to loosen and remove material stuck to tires prior to trucks and equipment leaving the active landfill area.

The access roads within WDS#3 will be maintained through wetting and grooming to reduce dust generation from vehicles transporting CCR to the active cells. Vehicle speeds are posted with a speed limit to reduce the generation of fugitive dust.

3.0 CITIZEN COMPLAINTS

Citizen complaints involving CCR fugitive dust events at the facility will be routed to the Site Operator for the Weston Disposal Site No. 3 Expansion landfill. Citizen complaints are generally received by the Wisconsin Public Service Corporation Call Center at (800) 450-7260, but may also be received by the Town of Knowlton. The Site Operator will prepare a complaint summary including information provided by the citizen (such as name, date, time, nature of complaint), a summary of conversations with the citizen and a summary of any actions taken to address the citizen complaint. Complaint summaries will be included in the annual fugitive dust control report as required by 40 CFR 257.80(c).

4.0 ASSESSMENT OF FUGITIVE DUST CONTROL PLAN

The fugitive CCR dust control measures outlined in this plan were developed as part of the plan of operations for the facility in accordance with NR 506 of the Wisconsin Administrative Code. These fugitive dust control measures have been effective in minimizing the generation of airborne dust at other CCR facilities. Construction of cells 1 and 2 began May 2015 and initial receipt of CCR is anticipated to begin in the first quarter 2016. The continuing effectiveness this fugitive dust control plan will be evaluated by the Site Operator during the preparation of the annual CCR fugitive dust report required by 40 CFR 257.80(c) by auditing the fugitive dust control measures outlined in Section 2.0 and after citizen complaints are received. After an audit or compliant, the Site Operator will document any fugitive CCR dust issues. The Site Operator will complete weekly audits for the two months after initial CCR disposal occurs. Modifications to this plan will be made on an as needed basis to address any deficiencies after disposal operations begin at the facility in 2016. Amendment of the plan will occur any time there is a change of conditions or CCR handling procedures that substantially affect the content of this written plan.

5.0 CERTIFICATION

To meet the requirements of 40 CFR 257.80(b)(7), I Mark W. Loerop, hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR 257.80.

By: _____

Name: Mark Loerop

Date: Oct 13, 2015