

# Quarterly Fugitive Dust Complaint Report

1<sup>st</sup> Quarter 2024

For the

Dallman and Lakeside Coal Combustion Residuals Surface  
Impoundments and Landfill

City Water, Light and Power (CWLP)

Springfield, Illinois



Prepared by:

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*April 2, 2024*

## **Introduction**

Pursuant to the requirements of IAC Title 35 Part 845.500(b)(2)(A) and submitted in accordance with IAC Title 35 Part 845.500(b)(2)(B) , CWLP must prepare a Quarterly Coal Combustion Residuals (CCR) Fugitive Dust Citizen Complaint Report inclusive of the following information dating 14 days from the end of each quarter. Pursuant to the requirements of IAC Title 35 Part 845.500(c) the quarterly report will be included in the Annual CCR Fugitive Dust Report and placed in the Facility's operating record in accordance with IAC Title 35 Part 845.800(d)(14). This Report includes:

1. Date of citizen complaint
2. Date of the incident
3. Name and contact information of complainant if given
4. Summary of corrective measures taken

## **Description of Actions Taken to Control CCR Fugitive Dust**

- a) The paved roadway entrance to the facility shall be watered and/or swept as often as practicable to remove mud, dirt or similar debris. This is consistent with good engineering practice that consistently delivers satisfactory results and is a key component in the formal fugitive emission and control calculations as published by the EPA and is congruent with requirements found in the facility's Title V federal operating permit.
- b) Fugitive dust emission reduction, roadway conditions, and employee safety concerns will limit vehicle speed to 10 mph on all roadways inside the facility. EPA emissions factors correlate vehicular speed with dispersed particulates. This engineering control is adequate as demonstrated by past experience and is consistent with the approach used to obtain federal air permits at the facility.
- c) CCR storage piles maintain surface moisture sufficient to reduce wind-blown erosion and fugitive dust. Gypsum and ash have a moisture content of 10-20%. Industry-accepted methods for calculating fugitive particulate matter place great emphasis on the percent moisture of the material. With the moisture content so high given the nature of the product generation and transference, this is adequate to control fugitive emissions.
- d) Material handlers operating inside the facility will exercise caution and care in CCR pile manipulation and loading procedures in order to minimize fugitive dust emissions. Good engineering practice to reduce the mechanical movement of CCR material with itself and with machinery demonstrates a commensurate reduction in fugitive dust.
- e) During high wind events, material handlers will reduce or halt operations. Past experience has demonstrated that leaving piles undisturbed minimizes the possibility of entraining particulate material in the wind.

- f) All haul trucks carrying wet CCR material from the Dallman generating station into the facility are not required to be covered due to the natural surface moisture content of the material. However, if the CCR material is handled dry in the future, then all haul trucks will be covered to reduce fugitive dust. Good practice and experience has shown that sheltering the CCR material from airflow generated by the vehicular transference of material greatly reduces the entrainment of particulates in to the atmosphere.
- g) In order to reduce roadway fugitive dust from the facility, a six foot concrete barrier wall has been constructed on the southeast side of the facility as a preventative measure. This barrier dissuades the movement of windborne material to disperse over and collect upon the roadway surface.
- h) In addition to the constructed wall mentioned above, the natural growth of vegetation within and surrounding the facility serves as a further control against roadway fugitive dust. Such an engineering practice is the industry standard for control as the above-ground fibrous vegetation creates a natural wind break while the root system anchors the CCR material in place.

## All Citizen Complaints

There have been no citizen complaints registered in reference to fugitive dust from the Dallman and Lakeside CCR Surface Impoundments and Landfill. A copy of the Fugitive Dust Citizen Complaint Log is below;

Fugitive Dust Citizen Complaint Log								
Complaint Background Details				Received Dust Event Details				Summary of corrective measures taken
Date Received	Time Revived	Name Provided	Contact Information	Date Observed	Time Observed	Source and Location Description	Comments/Other	
No Complaints								

## Summary of Corrective Measures Taken

There have been no additional corrective measures taken; however, CWLP continues to execute fugitive dust management practices in accordance with the Fugitive Dust Control Plan.