



Fugitive Dust Control Plan

Ash Disposal Facility

Hoot Lake Plant

INTRODUCTION

The purpose of this Coal Combustion Residuals (CCR) Fugitive Dust Control Plan (Plan) are to: (1) satisfy the requirements described in 40 CFR §257.80, Air Criteria, as they apply to CCR units, roads, and other CCR management and material handling activities; (2) identify the primary sources of CCR fugitive dust; (3) establish operating and training procedures and work practices to minimize CCR fugitive dust; (4) establish recordkeeping and response procedures; and (5) establish quality assurance procedures for periodic review of the effectiveness of the Plan.

Otter Tail Power Company personnel are responsible for (1) implementing the procedures and practices contained in the Plan; and (2) documenting compliance with the Plan by periodic monitoring of its effectiveness and implementation. Records demonstrating Plan compliance will be maintained onsite. The records will include a log of citizen complaints regarding fugitive dust and will be available to inspectors at their request. This log will also be included as part of the annual report as required by 40 CFR §257.80(b)(3).

FACILITY INFORMATION

Otter Tail Power Company
Hoot Lake Plant
1012 Water Plant Road
Fergus Falls, MN 56537
(218) 739-8100
46°17'14.40"N, 96° 1'56.48"W

PROCESS INFORMATION

Hoot Lake Plant has been decommissioned and the CCR landfill was closed in place in the Summer of 2023. The landfill entered the post closure care period on January 11, 2024.

POTENTIAL CCR FUGITIVE DUST SOURCES

There are no potential sources of CCR fugitive dust at the closed landfill.

COMPLIANCE MONITORING

Visual observations of the landfill will be made by Otter Tail Power Company employees during routine landfill inspections. Since vehicle traffic on maintenance and access roads will be limited to light-duty

vehicles performing routine inspections, no CCR fugitive dust generation is expected or even possible on the haul roads. If excess fugitive dust is observed due to road use, one or more BMP or multiple BMPs will be activated. If excessive fugitive dust is observed, documentation of the observation and BMP implementation will be made. See the BMP and RECORDKEEPING sections below.

CONTROL OF FUGITIVE DUST - BMPS

40 CFR §257.80 (b)(1) and (b)(2), Air Criteria, describe regulations applicable to emissions control strategies for this CCR FDCP. Relevant segments are cited below.

40 CFR §257.80 (b)(1) states, "The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions."

Additionally, 40 CFR §257.80 (b)(2) states, "If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids."

The following Best Management Practices (BMPs) have been identified as CCR fugitive dust control measures that are most appropriate for the facility and will be used to minimize CCR fugitive dust from becoming airborne:

1 Water

Fugitive dust is largely controlled by the use of water. Water may be used to wet the unpaved access and maintenance roads.

2 Vehicle Speed Control

Vehicles traveling the access and maintenance roads and within the closed landfill are restricted to 20 miles per hour when traveling to and from the closed landfill.

TRAINING

Employees (including new employees and newly assigned employees and contractors) who operate equipment that has the potential to produce and/or control CCR fugitive dust will be trained on the BMPs of the Plan. Refresher training will occur annually for employees who have gone through their initial training.

Training will be conducted by qualified individuals familiar with the requirements of CCR Rule (40 CFR §257.80) and plant operations. The training will include all aspects of the Plan. The importance of controlling CCR fugitive dust facility-wide will be emphasized.

RECORDKEEPING

Records of all actions taken in adherence to the Plan will be maintained and shall include: (1) Training Certification Records; (2) Citizen Complaint Log; and (3) Annual CCR Fugitive Dust Control Report.

1 Training Certification Records

When training occurs (either initial training or refresher training) a log will be kept of those events. The log will include: the date and time of training; the name and title of the trainer; the name and titles of trainees; the status of the trainee (new employee/contractor or annual refresher); and a description of the training provided. Training records will be maintained in the plant files and will be retained for five years. A copy of the training record will be submitted to the facility's Environmental Services Department.

2 Citizen Complaint Log

Any citizen complaint of CCR fugitive dust received will be promptly reported to the Plant Manager and Environmental Services Department staff. The Citizen Complaint Log will be used to record any citizen complaint of CCR fugitive dust received by the facility. A record of the complaint will be entered into the Plant Operating Record and will include the following: date and time of complaint; specific nature of complaint; name of the person receiving the complaint; name(s) of persons complaint was relayed to; assessment of complaint; and corrective measures implemented to address the complaint.

3 Annual CCR Fugitive Dust Control Report

The first Annual CCR Fugitive Dust Control Report was completed in 2016. Subsequent reports will be completed by December 15th of each year. The annual report will include descriptions of actions taken by the facility to control CCR fugitive dust, a record of all citizen complaints and subsequent investigations and corrective measures taken.

QUALITY ASSURANCE

The Plan is considered a "living" document that is subject to change based on changes in site operation. As the facilities or operations change that would substantially affect the Plan, the Plan will be reviewed and amended as necessary. If the plan is updated, the new version of Plan will be put in the operating record "as it becomes available" in accordance with 40 CFR §257.105 (g).

CERTIFICATION STATEMENT

I certify that this Coal Combustion Residuals Fugitive Dust Control Plan meets the requirements of the federal regulations §40 CFR 257.80.



Paul M. Vukonich, PE
License No. 50857

January 29, 2024

Date