

# DTE Electric Company — St. Clair Power Plant Coal Combustion Residuals Fugitive Dust Plan

## **1.0 Purpose**

The purpose of this Coal Combustion Residuals (CCR) Fugitive Dust Plan (the "plan") is to establish measures to minimize CCR from becoming airborne at the facility as outlined in 40CFR257.80.

## **2.0 Scope**

The plan applies to measures to control CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

## **3.0 Site Description**

St. Clair Power Plant is located in East China Township, Michigan. The plant is located on the St. Clair River between Lake Huron and Lake St. Clair. St. Clair Power Plant is an ISO14001 certified facility. There is one active CCR surface impoundment at the site: the bottom ash basins located to the south of the plant. The bottom ash basins are licensed in accordance with Michigan's solid waste disposal licensing requirements (Operating License 9631, 2020).

The bottom ash basins are located south of the power plant, just west of the St. Clair River. The basins accept bottom ash from the plant as well as runoff from the area immediately surrounding the basin. The bottom ash basin is composed of two sections. The east section has a volume of approximately 419,000 gallons and the west approximately 897,000 gallons.

## **4.0 Dust Control Measures**

The following dust control measures provide site specific mechanisms to manage and minimize fugitive dust created from CCR management operations and were developed in accordance with good engineering practices. Many measures for dust control are used throughout the power plant. These include limiting speed, water sprays, dust suppressant application, conditioning, the use of a vacuum sweeper, training, and others. All control measures can be used where appropriate except when freezing conditions exist or as otherwise specified. Additional dust control measures will be taken as appropriate.

The speed limit on all paved and unpaved travel surfaces is 10 miles per hour (mph). The ash haul road between St. Clair Power Plant and the Range Road Landfill is posted at 20 mph. These speed limits apply to all traffic.

Paved and unpaved surfaces are regularly water-flushed, as necessary. Paved surfaces are also frequently vacuum-swept. Water-flushing is done

using wash down hoses, the water truck, or one of the plant's water wagons using copious amounts of water. During periods where there is no precipitation, water is applied to paved and unpaved surfaces multiple times per day. Unpaved roads and lots are also treated with dust suppressant several times per year, as needed.

Personnel responsible for the implementation of this fugitive dust plan are appropriately trained to proactively manage fugitive dust; and identify and correct any deficiencies in the dust control measures.

## **5.0 Effectiveness Assessment & Monitoring**

The effectiveness of this plan will be assessed through several avenues. First and foremost, plant personnel perform routine inspections throughout the facility daily. Instances of fugitive dust observed on the property are addressed in a timely manner. The entire plant is subject to periodic facility environmental audits coordinated by the corporate environmental organization.

Agency inspections are also done on a regular basis. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) inspects all emissions and fugitive dust controls on an annual basis. These agency inspections are in addition to site environmental personnel being at the facility for water discharge sampling, weekly visual CCR inspections or other activities. The entire plant property, including the CCR units, is included in the periodic facility environmental audit plan coordinated by the corporate environmental organization as well.

Any complaints filed by citizens regarding fugitive dust or other environmental issues at the onsite or any other part of the facility are logged and tracked via procedures set forth by the plant's aforementioned ISO14001 environmental management system. The complaint will be recorded, the cause of the complaint will be investigated, and corrective action will be taken if warranted.

## **6.0 Amendment of Plan**

This plan will be reviewed periodically by the DTE Energy Environmental Management and Resources organization. Reviews and revisions will be documented in the Revision History section 8.0 of this plan. Any construction of a new CCR unit or change in the operation or construction of an existing CCR unit will be assessed for necessary changes to this plan.

## **7.0 Reporting & Recordkeeping**

An annual CCR fugitive dust control report will be completed as required under 40CFR257.80(b)(7)(c). The report will include a description of actions taken to control CCR fugitive dust, a record of citizen complaints, and a summary of any corrective measures taken.

All files and information will be maintained in a written operating record as required by 40CFR257.105(g). Notifications will be made as required by 40CFR257.106(g). Website postings will be made as required by 40CFR257.107(g).

## 8.0 Revision History

Revision Number	Revision Date	Changes
0	10/19/2015	Original Document
1	7/17/2019	Provided details in sections 4.0 and 7.0
2	11/9/2021	Provided operating license information in section 3.0. Refined activities in section 5.0.

PROFESSIONAL ENGINEER CERTIFICATION  
40 CFR 257.80(b)(7)

CERTIFICATION: By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 257.80, that I or my designated agent have visited and examined the facility, that this plan has been prepared in accordance with good engineering practices, and with the requirements of this Part, that the plan is adequate for the facility.

Signature: Nicholas Reidenbach

Engineer: Nicholas Reidenbach

Registration No.: 6201060717 State: Michigan

Date: 11/8/2021

SEAL:

