

Fugitive Dust Control Program

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) regulates the fugitive emissions of particulate matter from sources such as material handling and roadways. Condition IX.1 under Source-Wide Conditions of the Title V Permit MI-ROP-A0884-2016 states “the permittee shall carry out a Fugitive Dust Control Program to control fugitive dust emissions from the plant roadways, material storage piles, and other operations throughout the plant, including keeping of records of fugitive dust control activities and dates carried out”. The following will be a policy for the operating areas that have operational control over systems that can potentially emit fugitive emissions.

The Fugitive Dust Control Program meets the requirements identified in R 336.1372. The following sections identify each area that has a potential to emit or cause a fugitive emission and what operational procedures or controls are being performed for each. In addition to the stated operational procedures, personnel will also notify their Supervisor or the Environmental Department if a visual observance of a fugitive emission or spill occurs.

- 1.1 Loading or unloading operations at open storage piles of bulk or raw materials is a potential source of fugitive dust. Materials stored in piles on the mill site include coal, wood waste, wood chips, and sludge.

Control methods for controlling fugitive emissions from loading or unloading activities at piles include:

- Wood chips and some wood waste are conveyed pneumatically. In addition, water is added to the chip chutes of the softwood and hardwood handling equipment during the months when there is no freezing (approximately April through October).
- Chip pile modos are placed close to the chip pile to minimize the distance between the discharge point and the pile.
- The drop distance and proximity to the storage pile are minimized for unloading coal and sludge, which are delivered by truck. The materials are unloaded on a flat pad, near the storage pile, to minimize emissions resulting from windy conditions. The drop distance is from the dump box to the pad, typically +/-3 feet.
- If fugitive emissions are observed from the coal, wood waste, wood chip, or sludge piles, the piles will be wetted down via trucks, hydrants, or whatever means necessary to stop the fugitive emissions.

- 2.1 The transportation of bulk or raw materials such as ash, wood, wood chips, sludge, coal, and miscellaneous by-products are a potential source of fugitive dust.

	Fugitive Dust Control Program	Revision Date 5/19/2020 Page No: 2 of 3
---	--------------------------------------	---

Control methods for controlling fugitive emissions resulting from the transportations of bulk materials include the following:

- Contracted trucks hauling coal or other materials on-site should remain covered until ready to unload. Trucks hauling materials off-site should be covered immediately after being filled.
- Trucks and dumpsters should not be loaded such that materials in the boxes exceed the height of the box sidewalls.
- Restricting the speed limit of the vehicles transporting the raw or bulk materials. The vehicle speed limits are 15 MPH on all mill roads south of the Waste Water Treatment Plant (WWTP) and 30 MPH on all other roads north of the WWTP.
- Routine maintenance maintains tight trucks and dumpsters to prevent and eliminate leakages.
- Truck bodies used to transport wood are swept clean once the wood has been unloaded.

3.1 The outdoor conveyance of raw or bulk materials is a potential source of fugitive dust.

Control methods for conveying materials include the following:

- All conveyor belts for transporting coal, wood waste, sludge, and wood chips are 210-degree to completely enclosed and the enclosures are maintained.
- Spill materials from the ground under conveyors are removed on an as-needed basis.

4.1 The use of roads and lots are a potential source of fugitive dust.

Control methods for minimizing or eliminating fugitive emissions from roads and lots include the following:

- A number of roadways/lots have been paved and maintained to control fugitive dust. This includes River Road, South Kiln Road, North Kiln Road, Center Road, Low Road, High Road, Alum Road, 1st Street (to the landfill), 2nd Street, and 3rd Street (to High Road), Employee and truck parking lots, and coal, wood, wood waste, and wood chip storage areas.
- The woodpad where most of the wood is handled/unloaded will be wet down by operators in the summer months on an as needed basis. Operators will run water hoses and “dam up” the pad area to maintain wetted conditions and minimize road dust.

	Fugitive Dust Control Program	Revision Date 5/19/2020 Page No: 3 of 3
---	--------------------------------------	---

- The mill roadways will be mechanically cleaned with a vacuum type street sweeping truck twice per year, after snowcover has melted. Additional cleaning of particular roads or parking areas by sweeping or flushing/watering will be performed on an as needed basis.
- The mill gravel roads will be maintained by grading and filling in areas where the road gravel thickness causes “pot holes” each Spring and on an as needed basis.
- The high traffic volume gravel roads will be treated with a dust-suppressant compound (calcium chloride solution) in the summer as needed. The calcium chloride solution is applied using a tanker/application truck. When calcium chloride is applied, care is taken to avoid spraying the solution near groundwater monitoring wells.
- No. 11 ash handlers regularly wash the road and turn-around in the ash loading area. The roadway adjacent to the No. 11 ash loading area is sloped to facilitate drainage of fugitive dust to the process sewer.

Plan Revision Record

Revision Date	Description of Change	Reviewer
8/9/06	Original document	
7/8/16	Updated permit number in first paragraph, added document header and revision table	P. LaFleur
9/28/16	Added “Contracted” to first bullet in section 2.1 to indicated that only contracted trucks are required to be covered.	p. LaFleur