

# Fugitive Dust Control Operating Plan

Prepared for  
Wyandotte Municipal Services – Power Plant



Updated August 2021



# Fugitive Dust Control Operating Plan

Prepared for  
Wyandotte Municipal Services – Power Plant

August 2021

# Fugitive Dust Control Operating Plan

August 2021

## Contents

1.0	Purpose and Scope.....	1
1.1	Purpose.....	1
1.2	Scope.....	1
2.0	Management Practices.....	2
2.1	Roadways and Unpaved Areas.....	2
2.2	Calcium Chloride Alternative.....	2
3.0	Recordkeeping Requirements.....	3

## List of Attachments

Attachment A: Fugitive Dust Recordkeeping Form

---

---

## 1.0 Purpose and Scope

### 1.1 Purpose

The purpose of this Fugitive Dust Control Operating Plan (FDCOP) is to outline the procedures to minimize fugitive emissions generated by unpaved areas of the plant yard and traffic on plant roadways. The FDCOP is required for the Wyandotte Municipal Services – Power Plant (WMS) as a condition of the Renewable Operating Permit (ROP).

This Plan will remain in effect throughout the renewals and subsequent Title V permits for the WMS facility, unless otherwise amended and approved by EGLE.

### 1.2 Scope

Fugitive emissions generated by unpaved areas (e.g. plant yard) and traffic on plant roadways will be controlled in accordance with the FDCOP. This FDCOP was prepared in accordance with the Consent Order (SIP No. 34-1993) issued on September 9, 1994 and it can be revised as outlined in the Consent Order.

---

## 2.0 Management Practices

### 2.1 Roadways and Unpaved Areas

The Wyandotte facility has three (3) types of road surfaces – paved, gravel and dirt. In addition, the site includes the plant yard which includes unpaved areas.

For reasons of safety, vehicle speeds on these roadways and plant yard typically do not exceed 10 mph. This slow traffic pattern lends itself to minimizing fugitive dust emissions. Gravel areas are periodically maintained with the addition of more gravel as necessary. Fugitive dust from the paved road is further minimized by having the roadway cleaned as needed between April and November.

Control of fugitive dust from unpaved areas will be performed through the use of a calcium chloride solution or another form of equivalent or better method. It is proposed to make applications of calcium chloride during the April to mid-November period as needed depending on weather conditions.

### 2.2 Calcium Chloride Alternative

An asphalt emulsion applied at the manufacturer's recommended dilution ratio and application rate is an acceptable alternative to calcium chloride applications required for unpaved areas and gravel. The frequency for asphalt emulsion application is the same as that required for calcium chloride, described in Section 2.1.

---

## 3.0 Recordkeeping Requirements

The following lists the recordkeeping requirements. See Attachment A for an example WMS Fugitive Dust Recordkeeping Form, which incorporates the recordkeeping and reporting requirements as listed below.

### **Recordkeeping for Fugitive Dust Sources Required Records**

- |                    |   |
|--------------------|---|
| Unpaved Roads/Lots | <ol style="list-style-type: none"><li>1. Date of Treatment</li><li>2. Control Measure Used</li><li>3. Product Applied</li></ol> |
| Paved Roads/Lots   | <ol style="list-style-type: none"><li>1. Date of Treatment</li><li>2. Control Measure Used</li></ol>                            |

### **Optional Records**

- |                    |   |
|--------------------|---|
| Weather Conditions | <ol style="list-style-type: none"><li>1. Precipitation</li><li>2. Temperature</li><li>3. Wind Direction and Speed</li></ol> |
|--------------------|---|

## **Attachment A**

### **Example Fugitive Dust Recordkeeping Form**



# EXAMPLE FUGITIVE DUST RECORDKEEPING FORM

## Wyandotte Power Plant FUGITIVE DUST CONTROL TRACKING LOG

WEATHER CONDITIONS (Optional - observed as needed)								
Date	Temperature (°F)	Wind Speed (mph) and Direction	Precipitation ( Y / N )	Type (circle)			Shift	Employee
				Rain	Snow	Sleet		
				Rain	Snow	Sleet		
				Rain	Snow	Sleet		
				Rain	Snow	Sleet		
				Rain	Snow	Sleet		
				Rain	Snow	Sleet		
				Rain	Snow	Sleet		

DUST CONTROL LOG (Log as activity occurs)					
* Roadways cleaned as needed between April 1-November 15.					
** Unpaved and gravel areas are to be treated with chemical application as needed per April-November period.					
Roadways	Control Description (circle)			Date	Employee
Gravel	Sweep	Water	Other Chemical		
Unpaved	Sweep	Water	Other Chemical		
Paved	Sweep	Water	Other Chemical		
Comments:					

PERIODIC OBSERVATIONS (OPTIONAL) (see corrective actions above if any)	
Date:	Observer:
Area / Roadway	Dust Observed? ( Y / N )
Gravel	
Unpaved	
Paved	
Plant Yard	