AMERENENERGY MEDINA VALLEY COGEN, LLC:
Hutsonville Energy Center

Initial CCR Fugitive Dust Control Plan

Rev	Date	Revisions	Originator	Reviewer	Approver
0	05/08/2025	Initial Issue	B. Herries	J. Seymour	T. Ward

PROFESSIONAL ENGINEER CERTIFICATION

I certify and attest that the Plan meets the requirements of 40 CFR Part 257.80.

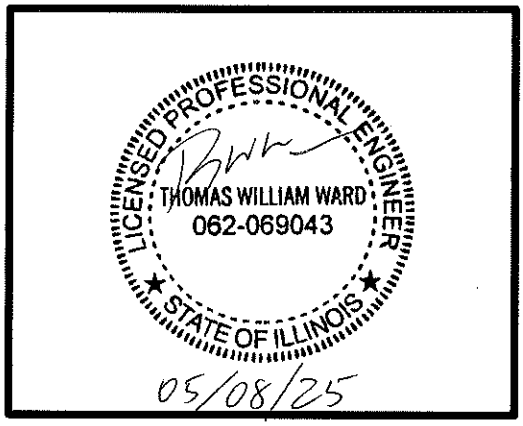

Table of Contents

1.0 INTRODUCTION

The purpose of this Dust Control Plan is to identify and describe the measures that AmerenEnergy Medina Valley Cogen, LLC (Medina Valley) will use to minimize Coal Combustion Residuals (CCR) from becoming airborne at its facilities. The Plan is prepared in accordance with the Environmental Protection Agency Coal Combustion Residuals (CCR) Rule, 40 CFR Part 257.80. The Plan addresses CCR fugitive dust monitoring, corrective actions to be implemented including work activity changes, logging of any dust complaints, and procedures to assess the effectiveness of the Plan.

The overall intent will be to effectively minimize CCR from becoming airborne at each Medina Valley facility, including fugitive dust originating from CCR units and other CCR management activities. This Plan is not intended to cover fugitive dust that are unrelated to CCR management or that are not comprised of CCR materials (e.g. wind-blown dust resulting from farming activities near Medina Valley facilities or fugitive dust from non CCR related roads).

2.0 REQUIREMENTS FOR CCR FUGITIVE DUST CONTROL PLAN MANAGEMENT

2.1 RESPONSIBILITIES

Designated Site Representative: The designated site representative (DSR) shall be responsible for overall administration of the CCR Fugitive Dust Control Plan. The DSR shall also be responsible for responding to CCR fugitive dust complaints and implementing the appropriate dust control action. The DSR shall ensure that Medina Valley CCR staff and any contractor staff are trained in accordance with the requirements of this Plan as required in Section 2.4. The DSR shall ensure that CCR Fugitive Dust Control Plan is included in the CCR operating record required by Section 2.2 and 40 CFR 257.105(g). The DSR shall ensure inspections are performed as required by Section 5 to assess conditions and the potential for CCR fugitive dust and determine the need for changes to the implementation of dust control measures.

Medina Valley Staff: Medina Valley staff is responsible for notifying the site representative of significant CCR fugitive dust, when observed. The notification should include a description of the source location of the CCR dusting event and the time when it was observed and any other information deemed relevant to the event. Relevant information may include weather conditions, operations in the area of the event, etc.

Medina Valley Contractor Staff: Medina Valley contractor staff is responsible for conducting work in a manner that minimizes the generation of CCR fugitive dust. Contractor staff are also responsible for notifying their site contact or the DSR if CCR operations appear to be generating significant amounts of CCR fugitive dust and to take steps to minimize dust generation in accordance with the requirements of this Plan and as directed by the DSR.

2.2 OPERATING RECORD

Medina Valley shall maintain a written record of this Plan on file in accordance with 40 CFR 257.80(b)(5), 257.105(g)(1) and Ameren's record retention policy. The Plan shall be certified as meeting the requirements of 40 CFR 257.80 by a qualified professional engineer prior to inclusion in the Operating Record.

The operating record shall be updated annually (every 12 months) to include the Annual CCR Fugitive Dust Control Report required in Section 5 of the Plan and 40 CFR 257.80(c) and 257.105(g)(2).

Notification shall be made to the Illinois Environmental Protection Agency (IEPA) upon each update to the operating record as required by 40 CFR 257.106(g)(1) and (g)(2). Electronic copies of the CCR Fugitive Dust Control Plan and the CCR Fugitive Dust Control Report shall be posted to the internet upon inclusion in the Operating Record as required by 40 CFR 257.107(g).

2.3 COMPLAINT LOG

Medina Valley staff will document dusting complaints received from outside parties and notify the DSR of all complaints. The complaint documentation shall include: date and time the complaint was received; date, time and location of the observations leading to the complaint; nature of the complaint; and the contact information for the complaining party. (Attachment 1). The DSR, or his/her representative, shall investigate the nature of each complaint and determine the need for any changes to the implementation of dust control measures. Medina Valley staff will also meet routinely as described in Section 5 to discuss the Plan effectiveness, assess dust control measures, and discuss any dusting complaints received.

2.4 PERSONNEL TRAINING

Medina Valley will conduct dust control training for CCR facility-related personnel as necessary. Training topics shall include but not be limited to: the importance of dust control, individual responsibilities, purpose of inspections, documentation requirements, the potential sources of dust, dust control measures being employed on-site and corrective actions in the event of fugitive dust. All CCR facility personnel have responsibility for CCR fugitive dust control. Any facility staff who observes fugitive dust related to CCR handling shall respond as appropriate in accordance with this Plan.

3.0 POTENTIAL CCR FUGITIVE DUST SOURCES

Attachment 2 lists the potential CCR fugitive dust sources.

4.0 OPERATING PRACTICES AND CONTROL MEASURES

The practices and measures that will be implemented for the potential fugitive dust sources listed on Attachment 2 are described below.

4.1 ROADWAYS AND HAUL ROADS

No hauling activities are expected at this inactive facility. If hauling of CCR is necessary due to maintenance or other activities, the following controls will be utilized:

- Primary Controls: Traffic control (e.g., controlling routes, speeds, and movements to mitigate CCR fugitive dust). Watering of roadways shall be performed as conditions require.

- Contingent Controls: Increased application of primary controls. Apply a dust control agent additive with water application. Alter work activities during high wind conditions.

- Practices: Medina Valley staff will be diligent in observing visible CCR fugitive dust and take appropriate primary and contingent control actions to address the fugitive dusting condition.

- Primary and Contingent Control Applicability: Industry has historically used surface water application and/or traffic changes to prevent and control the potential for fugitive dust on roadways and haul roads. Watering and dust control agents are very effective control measurements, particularly when used in combination with traffic control measures on roadways.

4.2 CCR POND COVERS

The existing CCR Ponds have been capped with a cover system which includes an HDPE liner overlain by three feet of cover soil. Exposure of CCR is not expected. If CCR is exposed for maintenance or other activities, the following controls will be utilized:

- Primary Controls: Maintain cover vegetation. Watering shall be performed as conditions require. Avoid exposing CCR unless necessary.

- Contingent Controls: If CCR becomes exposed, watering shall be performed as conditions require. Apply a dust control agent additive with water application. Cover dusting surface with coarse aggregate materials. Reconfiguration of surface contours and windbreaks to alter work activity functions.

- Practices: Medina Valley staff will perform visual inspections as necessary to verify CCR fugitive dust controls are effective. Appropriate primary and contingent control actions will be implemented if fugitive dust is observed.

- Primary and Contingent Control Applicability: Industry has historically used surface water application to control dust. Watering, dust control agents, and coarse aggregate material applications are very effective dust control measurements, particularly when used in combination with changes to work activities.

4.3 CCR OPERATIONS (MAINTENANCE)

Exposure of CCR is not expected during routine maintenance activities. Maintenance activities are expected to be very minimal and include mowing vegetation and addressing erosion, if necessary. If CCR is exposed for maintenance or other activities, the following controls will be utilized:

- Primary Controls: Watering will be utilized as conditions require during maintenance and other activities. Avoid exposing CCR unless necessary.

- Contingent Controls: Increased application of primary controls. Apply a dust control agent additive with water application. Cover dusting surface with coarse aggregate materials. Alter work activity functions.

- Practices: Medina Valley staff will perform visual inspections as necessary to verify CCR fugitive dust controls are effective if CCR is exposed. Appropriate primary and contingent control actions will be implemented if fugitive dust is observed.

- Primary and Contingent Control Applicability: Industry has historically used surface water application to control fugitive dust. Watering, dust control agents, and coarse aggregate material application are very effective dust control measurements, particularly when used in combination with changes to work activities.

5.0 PLAN QUALITY ASSURANCE AND QUALITY CONTROL

Medina Valley staff shall observe the capped CCR units and associated maintenance activities to assess conditions and determine the need for any changes to fugitive dust control measures.

5.1 INSPECTIONS

Medina Valley staff will conduct inspections of capped CCR units as part of the effort to periodically assess the effectiveness of the Plan in accordance with 40 CFR 257.80(b)(4). Inspections shall include areas where CCR fugitive dust generation may be observed based on capped CCR unit maintenance activities taking place at the time of the inspection. A log /record shall be kept identifying the date and time of each inspection and the inspection results. Substantial fugitive dust will be noted in the log as well as the underlying cause of the CCR fugitive dust, any corrective measures undertaken or alternative dust control measures recommended for implementation.

5.2 PLAN QUALITY CONTROL

The DSR, Medina Valley and any contractor staff will hold meetings as necessary to discuss and assess the overall effectiveness of the Plan and dust control measures as required by 40 CFR 257.80(b)(4). The fugitive dust complaint log will also be reviewed to identify any areas of concern. The purpose of these meetings will be to evaluate the sources of dusting, the effectiveness of the implemented dust control measures, and the need to update or revise the Plan and/or operations to minimize the potential for future CCR fugitive dust. The goal will be to improve the overall effectiveness of the Plan and dust control measures.

Updates to the Plan shall be made as determined by the DSR and Medina Valley staff. Updates shall become effective once certified and included in the Operating Record described in Section 2.2. Updates shall be required whenever there is a change in conditions of the Plan that substantially affects implementation of the Plan such as the construction, operation, and closure of a new CCR unit as required by 40 CFR 257.80(b)(6).

5.3 ANNUAL REPORT

The DSR and Medina Valley staff will annually prepare a CCR fugitive dust control report that shall include a description of the actions taken to control CCR fugitive dust, a record of all citizen complaints and a summary of any corrective measures taken. This report will be placed in the facility operating record in compliance with the requirements of the Environmental Protection Agency Coal Combustion Residuals Rule, 40 CFR Part 257.80(c) and 257.105(g).

ATTACHMENT 1

Fugitive Dust Citizen Complaint Log

COMPLAINT BACKGROUND DETAILS				RECEIVED DUST EVENT DETAILS			
Date Received	Time Received	Name Provided	Contact Information	Date Dusting Observed	Time Dusting Observed	Dust Source and Location Description	Comments/Other

ATTACHMENT 2

Potential Source Dust Control Matrix

Potential CCR Dust Source	Primary Control Methods and Practices	Contingent Control
Roadways and Haul Roads (Not Expected)	• Water application • Traffic changes, e.g. routes, speeds, movements	• Apply dust control agent • Alter work activities
CCR Pond Covers	• Apply water • Avoid exposing CCR	• Apply dust control agent • Fill rills/gullies with soil and/or riprap to mitigate erosion • Patch HDPE liner and recover with soil and establish vegetation should HDPE become damaged
CCR Operations (Maintenance)	• Apply water • Avoid exposing CCR	• Apply dust control agent • Alter work activities • Cover with coarse aggregate