

# **FUGITIVE DUST CONTROL PLAN (40 CFR Part 257.80)**

**GREENIDGE GENERATION LLC**

**Prepared on behalf of:**

**Greenidge Generation LLC**  
590 Plant Road, PO Box 187  
Dresden, New York 14441

**Prepared by:**



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**November 2020**

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**List of Attachments**

- 1 Citizen Complaint Log

## **1 INTRODUCTION**

Greenidge Generation LLC (“Greenidge”) operates an electric power plant in the Town of Torrey, Yates County, New York. The Greenidge Power Generating Station sat idle between the spring of 2011 and March 2017. In connection with its operations, Greenidge utilizes a 7.2-acre coal combustion residuals (“CCR”) impoundment (the “C-Pond”) which historically received CCR, as well as, a mixture of plant process waters and stormwater. While in C-Pond, CCR and wastewater underwent sedimentation as well as infiltration before effluent was discharged to Seneca Lake pursuant to a New York State Pollutant Discharge Elimination System (“SPDES”) permit (No. NY0001325). C-Pond only receives a mixture of plant process waters and stormwater through present operations. Greenidge has initiated discussions with the New York State Department of Environmental Conservation in an effort to secure the approvals necessary to modify its SPDES permit to revise its permitted outfall from the C-Pond. Following the necessary permitting process, the C-Pond will be closed in general accordance with the requirements in 40 CFR 257.102.

## **2 COMPLIANCE REQUIREMENT**

An owner or operator of a CCR facility must prepare a CCR fugitive dust control plan (Plan). Fugitive dust, as defined in the document, Compilation of Air Pollutant Factors (AP-42), U.S. Environmental Protection Agency, January 1995, is a discharge of material to the atmosphere and not in a confined flow stream such as a flue or stack. The Plan must describe the steps necessary to minimize CCR from becoming airborne at the facility, including fugitive CCR dust originating from CCR units, roads, and other CCR management and material handling activities. The written fugitive dust control plan must be consistent with the applicable requirements of 40 CFR Part 257.80(b)(1) through (7).

The following minimum information is required:

- Identification of CCR fugitive dust control measures;
- CCR waste conditioning procedure;
- Description of citizen complaint recordkeeping;
- Description of how the Plan's effectiveness will be assessed; and
- A description of the required annual report contents.

The Plan will require revision if there is a change in conditions that would substantially affect the written plan in effect. In addition, the Plan will require revision if the assessment of the current plan indicates its effectiveness is unsatisfactory. Revised plans are not in effect until they are certified by a qualified Professional Engineer and placed in the operating record.

### **3 EVALUATION**

When the Station operated using coal, C-Pond received bottom ash from a sluicing system. While the pond was cleaned of bottom ash regularly for offsite beneficial reuse, some CCR materials still remain in C-Pond. However, due to the continuous inflow of non-CCR process waters, the ash in C-Pond remains in a wetted condition and therefore, presents little risk of causing nuisance conditions from fugitive dust. For this reason, fugitive dust control measures are minimal under normal operating conditions.

#### **3.1 FUGITIVE DUST CONTROL MEASURES**

Fugitive dust control measures are to be practiced when the potential for nuisance conditions arise. The potential for nuisance conditions is identified as an area with exposed CCR during periods of dry and windy weather. The measures to be employed include standard procedures such as water truck usage on site roads or areas of exposed CCR, imposing speed limits on vehicles to minimize kick-up of dust, and maintaining vegetative cover to the extent possible in the area of the incised CCR impoundment.

#### **3.2 CITIZEN COMPLAINT RECORDKEEPING**

In accordance with §257.80(b)(3) of the Rule, this section outlines the procedures that Greenidge will utilize to log citizen complaints involving fugitive dust events at the facility. If a complaint is received, the name, local time, and a summary of the complaint will be recorded on the citizen complaint log included as Attachment 1. Each complaint will be followed by an investigation into the origin source of the fugitive dust. The results of the investigation will be recorded on a complaint log and communicated to the appropriate parties. If the investigation confirms a fugitive dust emission event, Greenidge will develop a plan to remediate any impacts and prevent future incidences, as necessary. Any actions taken to address the complaint will be added to the log entry.

Citizens wishing to make an observation of dusting conditions at Greenidge are directed to call 315-536-2359 and ask for the Engineer & Control Operator, who is responsible for the facility's environmental compliance.

### **3.3 ASSESSMENT OF PLAN EFFECTIVENESS**

Weekly Qualified Person inspections (Part 257.84(a)) include an assessment of fugitive dust conditions. This weekly assessment will describe any observed fugitive dust and its source, note corrective actions taken and document results of those actions.

If there are any severe instances of fugitive dust prompting complaints, this Plan will be reviewed at that time and modified as needed. If there is a chronic occurrence of minor events, such as only noted in the weekly inspections without offsite complaints, this Plan will be reviewed and modified as well.

Paragraph 257.80(b)(6) requires modification of the Plan if a facility adds new CCR units or any significant changes are made in the facility operations. The modified Plan will be reviewed and recertified by a registered Professional Engineer and will be placed in the facility's operating record as required per §257.105(g)(1).

### **3.4 ANNUAL REPORTING**

In accordance with §257.80(c), the facility will prepare an annual fugitive dust control report that includes a description of actions taken to control CCR fugitive dust, a record of all citizen complaints, and a summary of any response actions taken. Moreover, the annual reports will be included in the facility's operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the publicly accessible internet site per §257.107(g)(2).

#### 4 CERTIFICATION

"I hereby certify that I have reviewed the fugitive dust control plan for the Greenidge Power Generating Station owned and operated by Greenidge Generation LLC, and the requirements in federal regulation 40CFR Part 257 Subpart D - Standards for the Disposal of Coal Combustion Residuals (CCR) in Landfills and Surface Impoundments published April 17, 2015 and last amended on August 28, 2020. The proposed fugitive dust control plan has been designed and constructed to meet the requirements specified for CCR impoundments in 40 CFR 257.80 – Air Criteria."

As used herein, the word "certification" and/or "certify" shall mean an expression of the Engineer's professional opinion to the best of his or her information, knowledge, and belief, and does not constitute a warranty or guarantee by the Engineer.

I am a duly licensed professional engineer in the State of New York.

  
David A. Lenox, P.E.  
NYSPE LIC # 093384



11/12/2020

**ATTACHMENT 1**

**Citizen Complaint Log**

