



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 25, 2011

RE: RECENT COAL DUST COMPLAINTS
EASTLAKE POWER PLANT
FACILITY ID NO. 0243160009

CERTIFIED MAIL

Hank Ullom, Director
CEI - Eastlake Power Plant
10 Erie Road
Eastlake, OH 44095

Dear Mr Ullom:

We are in receipt of Mr. Kari Ceceris' e-mail which details action taken to-date and other planned actions to improve coal dust control from the coal yard at Eastlake Power Plant. Thank you for your prompt attention to this matter.

Of things yet to be accomplished, the sealing of the coal pile in long term storage and reconfiguring the pile into an 'L' shape to provide more windscreen for the Timberlake neighbors are the most important. Please notify Ohio EPA and Bert Mechenbier of Lake County upon completion of those tasks.

Over the past five years (2006-2010), high wind episodes have caused coal dust fallout complaints in early winter every year. Two causes of the complaints have been recurring issues; the portions of the coal pile in long term storage had not yet been configured in the most favorable shape to provide a windscreen for Timberlake, and the pile was not sealed prior to outdoor temperatures dropping below 25 F. Ohio EPA requests a new commitment from Eastlake Plant to accomplish both by December 1 of each year and that you report the completion of those tasks to this agency.

Going back to years 2000-2002 it was generally assumed that the then increase in coal dust fallout complaints from the neighbors was due to the fuel switch to primarily Western PRB coal, which is considered to have more dusting potential. However, this time around the sampling you've done indicates that the Eastern coal on-site was the source of the December complaints.

It should be noted that even after the gap between the Eastern and Western coal piles was closed and other measures taken, another dust fallout episode occurred on Jan. 12 or 13, as confirmed by the e-mail exchange between this writer and Mr. Ceceris.

In the past we have asked Eastlake Plant to look into some other possible fugitive dust control measures. A copy of our 2007 letter to Mr. Ceceris and his response are attached. Because the current equipment available and dust control measures being taken have not been sufficient to minimize nuisance dust fallout into the neighborhoods surrounding Eastlake Plant, Ohio EPA again asks that you research other possible permanent dust control measures and equipment including, but not limited to:

1. Installation of several more, permanent sprinkler stations to water the coal pile at regular intervals as done at the Ashtabua Harbor Coal Yard by Norfolk and Southern Railways.

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2. And/or, bring on-site a watering truck with a powerful spray 'cannon' capable of driving on and spraying the entire coal pile, again as done at the Ashtabula Harbor Coal Yard.
3. Add a water spray tank onto the front end loader that grooms the pile. See the website of Seneca Mineral (www.senecamineral.com) for retrofit systems.
4. Consider raising the dust control fence along Timberlake after doing some dispersion modeling of fugitive emissions sources to determine an effective reasonable height increase, if there is one as such.
5. Consider installing a wind screen of some type along the north-northwest end of the coal yard as a break for high speed winds off the lake. A review of meteorological records and dispersion modeling may be useful in determining shape and height of such a fence.
6. Consider tarping sections of the coal pile in long term storage as done at the Morton Salt Mine at the Mentor Headlands, Ohio.
7. Enclosed is a copy of an article from Power Magazine titled, (Burning PRB Coal) "Give your plant a dust control tune-up," for your review. See the part about the coal stacker chute in diagram no. 5. Is the chute stacker design on FF Belt the type that drops a streamlined material pattern which can minimize fines scatter?
8. Since winter shipments of coal are not being treated at the mines, would it be possible to add a dust control spray station for open railcars at the property fenceline to do on-site spray application prior to trains being unloaded?

Please respond in writing within 30 days as to the current or future feasibility of any the above and any other measures that you may deem feasible and effective.

If there are any questions or if you wish to discuss this matter, please feel free to contact the undersigned at (330) 963-1247.

Sincerely,



Ken Djukic
Environmental Specialist
Division of Air Pollution Control

KD:bo

enclosures

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