

Fugitive Dust Control Plan Didion Milling Inc. / Didion Ethanol, LLC

1.0 Objective

This document outlines the fugitive dust control measures that will be implemented at the Didion Milling Inc. / Didion Ethanol, LLC (Didion) facility located in Cambria, Columbia County, Wisconsin. Permit condition I. W. 1. a. (3) of construction permit 08-DCF-155 requires Didion to update its Fugitive Dust Control Plan (FDCP). The purpose of the plan is to minimize fugitive dust emissions from haul roads, scale, parking and material handling areas and to include P-21/F09 the grain conveyor to the ethanol plant. Didion has developed this FDCP in order to satisfy this permit requirement and to reduce fugitive dust emissions at its facility.

2.0 Scope & Application

This plan applies to the control of visible fugitive dust emissions that may originate through truck hauling and material handling processes. Fugitive dust is generated from the contact between the vehicle tires and the roads causing the re-suspension of loose material on the road surface. Fugitive dust is also generated when dry materials are transferred from trucks, rail cars, and material handling conveyors. This plan also defines preventative and corrective actions to inhibit the buildup and dispersion of visible fugitive dust emissions at the Didion Ethanol facility.

Didion proposes to minimize fugitive dust generated from the following activities at the Cambria facility:

- Incoming and Outgoing Haul Trucks
- Grain Conveying Between The Mill and Ethanol Plant.
- Wet Cake and DDGS Storage Buildings
- Accumulation of Grain Residue in and around Milling Plant

3.0 Control Methods & Frequency

All paved roads will be cleaned using a street sweeper (i.e. Elgin street sweeper or a Bob Cat equipped with an enclosed sweeper attachment or equivalent) **a minimum of least once per week**, weather permitting. This schedule may be modified, as required, based on suggested actions due to daily observations by specified observers, by WI DNR request, or as identified by Didion employees following guidelines set forth in this program. Paved road sweeping as described above will not be conducted on days where rain, snow, or other adverse weather events occur.

When maintenance is performed on the street sweeper resulting in significant downtime such that the sweeping frequency outlined in this document, cannot be performed Didion will utilize alternate street sweeping or rent/contract an alternate unit that will sweep in a similar manner. The alternate unit will be used until the primary sweeper is operational. If an alternate unit is not available, Didion will spray the roads with water or another dust control substance (weather

permitting) to temporarily control fugitive road dust until the broom sweeper is operational or another unit can be rented.

In addition, Didion will periodically remove accumulated grain residue at the milling plant grounds to prevent the entrainment of residue in windy conditions. If the material cannot be collected by a sweeper or other device, these accumulations shall be removed manually.

4.0 Periodic Evaluations, Corrective Action & Documentation

For each day of operation, Didion will conduct a visual inspection of the haul road system, scale, parking and material handling area conditions to determine if visible fugitive dust emissions are being generated and moving beyond the facility property boundary line.

All daily visual inspections will be documented (logged) and kept on file for five (5) years.

The frequency of sweeping will be increased if any of the conditions noted below are observed during a daily visual inspection.

- Dust created by motor vehicle traffic is seen moving beyond the property boundary line
- A buildup or accumulation of excessive dirt/dust/debris is present on a paved haul road
- Dust blown around by the wind is seen moving beyond the property boundary line

If increased sweeping will not correct the observed condition, contact the Environmental Manager to determine whether other measures need to be implemented to minimize fugitive dust.

All measures taken to minimize fugitive dust shall be documented (logged) and kept on file for 5 years.

5.0 Preventive Actions

The current permit establishes that no persons at the Didion facility may cause or permit the handling, transporting, or storage of any material in a manner which may allow particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the premises. Further, no person may cause or permit a building or its appurtenances, a road, a driveway, or an open area to be constructed, used, repaired, or demolished without applying all such reasonable fugitive dust control measures as may be necessary.

Preventive measures currently in place include:

- The establishment and maintenance of vegetation on all barren dirt areas (not under construction) to prevent the origination of fugitive dust.
- Fabric spout extensions, covered conveyors and/or other controls are used where practical and maintained to minimize fugitive dust.

- Signage is posted to limit the truck traffic speed to 5 miles per hour (mph).
- Signage is also posted to inform trucking contractors that their trailer must be covered prior to exit from the facility.
- Procedures/practices are documented and maintained to assure that each open truck is covered prior to exit from the facility as well as prior to entry where practical (e.g. excludes gravity trucks).
- Employees, contractors, visitors and vendors are discouraged (through communication) from tracking mud or other debris onto the facility's paved haul road system.

Precautions will be taken to prevent particulate matter from becoming airborne in the event a structure, a parking lot, or a road is used, constructed, altered, repaired, sand blasted or demolished. Whenever any of these activities is required, prior to the start of the project, they will be evaluated by the Environmental Manager. Documentation of this project review and preventative measure(s) will be generated and maintained on file.

6.0 Recordkeeping

- a) Daily fugitive dust visual inspection log sheets will be maintained and kept on file for a minimum of five (5) years.
- b) Documentation (logs) of all measures taken to minimize fugitive dust will be maintained and kept on file for five (5) years.
- c) Records of observations will be maintained which insure that trucking contractors with open grain or product trucks have the truck bed covered when leaving the facility and when entering where practical (and if so equipped) and kept on file for five (5) years.
- d) Didion will maintain records of truck and tankwagon traffic (vehicle mile traveled) to calculate monthly fugitive dust emissions. The monthly values will be used to determine the 12-month average values. The 12-month rolling sum will be maintained on file for a minimum of five (5) years.
- e) Didion's Environmental Manager will document project reviews where preventive measures are recommended and taken to minimize fugitive dust. These project reviews include: structural or surface construction, repairs, alterations, sandblasting, or demolishing. These records will be maintained on file for a minimum of five (5) years.

Attachment A
Facility Site Layout