

Annual CCR Fugitive Dust Control Report

Twin Oaks Power Generating Station

Robertson County, Texas

December 4, 2017

Table of Contents

<u>1.0 INTRODUCTION.....</u>	<u>1</u>
<u>2.0 FUGITIVE DUST CONTROL METHODS.....</u>	<u>1</u>
<u>3.0 CITIZEN COMPLAINT LOG.....</u>	<u>3</u>
<u>4.0 PLAN MAINTENANCE AND ASSESSMENT</u>	<u>3</u>

1.0 Introduction

The following Annual CCR Fugitive Dust Control Report (or Annual Report) is intended to fulfill the requirements of Coal Combustion Residual Rule 40 CFR §257.80 (Air Criteria). In accordance with 40 CFR §257.80(c) the following describes actions taken to control CCR fugitive dust, record of citizen complaints and summary of any corrective measures taken.

In accordance with 40 CFR §257.80(c), this annual report must be completed no later than 12 months after placing the first annual CCR fugitive dust control plan in the facility's operating record. The first Annual CCR Fugitive Dust Control Plan was placed in the facility's operating record on December 6, 2016. This report covers the time period between December 2016 and December 2017. The deadline for completion of subsequent Annual Reports is one (1) year after the date of completing the previous report.

2.0 Fugitive Dust Control Methods

As discussed in the CCR Fugitive Dust Control Plan (referenced herein as the Plan), wet suppression or mechanical application of water is the predominate and most effective method of suppressing and preventing fugitive dust at this facility. Application of suppression water is dependent on ambient conditions (e.g., rainfall, humidity, temperature), activities occurring in the areas (e.g., vehicle traffic) and other factors. Conditions are monitored throughout the day and adjustments are made in dust suppression activities based on visible emissions and maintaining a safe work environment.

The following control measures are operationally active and were implemented at the facility. Additional detail of each measure is discussed in the Plan.

Bed Ash Bunker. Control of dust is accomplished by maintaining the moisture content of bed (or bottom) ash, and controlling free fall heights as material is loaded and removed from the bunker. The bunker location and construction (concrete wing walls) protects against wind dispersion of material. **The operational and mechanical controls employed performed effectively and periodic inspection reported no issues. No modifications or changes in procedure are currently required.**

Fly Ash Silo – Merchant/Resale Truck Loading. Truck loading emissions were controlled by the continued use of a drop chute extending from the storage silo to the trailer. The drop chute consists of two (2) components, an inner chute that dispenses fly-ash and an outer chute that is under vacuum during loading procedures to capture dust. If any spillage were to occur, the material is immediately cleaned and properly disposed prior to vehicle movement. **The operational and mechanical controls employed performed effectively and periodic inspection reported no issues. No modifications or changes in procedure are currently required.**

Onsite Disposal Truck Loading. Prior to loading fly ash into open container vehicles (dump trucks) for onsite disposal, the fly ash is moisture conditioned (average moisture contents range between 25 to 30 percent) via an enclosed pug mill and then loaded into transport vehicles through a drop gate. The loading process is conducted in a partially enclosed bay. **The operational and mechanical controls employed performed effectively and periodic inspection reported no issues. No modifications or changes in procedure are currently required.**

Facility Roadways. Control of dust emissions on paved and unpaved roads includes periodic (and as needed) application of water, control of vehicle speed, road maintenance, and periodic cleaning via an onsite street sweeper (paved roads). **The operational and suppression controls employed performed effectively and periodic inspection reported no issues. No modifications or changes in procedure are currently required.**

CCR Landfill. Disposed ash material is moisture conditioned or in a moistened state (with no free water) prior to loading or transport to the landfill. Disposed material is spread in thin lifts and compacted, because the ash material is cementitious, it cures to a concrete like material; this reduces the possibility of emissions being generated after placement by wind or similar environmental conditions. Emissions from landfill access roads are controlled via water suppression and road maintenance. **The operational and suppression controls employed performed effectively and periodic inspection reported no issues. No modifications or changes in procedure are currently required.**

3.0 Citizen Complaint Log

In the event that excess CCR fugitive dust results in a citizen complaint, the facility Environmental Supervisor will be notified, the citizen complaint logged into the facility operating record, and the Environmental Supervisor will follow-up and document any corrective action taken to address the citizen complaint (as applicable). **The onsite Environmental Supervisor received no complaints during the period addressed by this Annual Report and no corrective actions were necessary.**

4.0 Plan Maintenance and Assessment

As provided in the Plan, the facility Environmental Supervisor (or similar official) should review the Plan every six (6) months or as necessary as new sources of fugitive dust emissions are observed, suppression systems are modified, or effectiveness of primary suppression systems altered. If new sources of fugitive dust emissions are identified, the Fugitive Dust Control Plan should be amended to reflect changes in the operation or primary suppression means employed.

Technical amendments made to the Plan should be reviewed and certified by a Professional Engineer prior to placement in the facility's operating record. The facility may add amendments as necessary.

The effectiveness of the Plan was reviewed periodically throughout the period and during the preparation of this annual report, and no additions or modifications to existing suppression systems or activities were warranted.