Annual CCR Fugitive Dust Control Report

Twin Oaks Power Generating Station

Robertson County, Texas

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Table of Contents

1.0 INTRODUCTION 1

2.0 FUGITIVE DUST CONTROL METHODS 1

3.0 CITIZEN COMPLAINT LOG 2

4.0 PLAN MAINTENANCE AND ASSESSMENT 2

1.0 Introduction

This Annual CCR Fugitive Dust Control Report (or Annual Report) is intended to fulfill the requirements of 30 TAC §352.801 (Air Criteria) and the 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, records any citizen complaints, and summarizes any corrective measures taken.

This Annual Report covers the period from November 2025 to November 2026.

2.0 Fugitive Dust Control Methods

As discussed in the CCR Fugitive Dust Control Plan (referenced herein as the Plan), wet suppression or application of water is the predominant and most effective method of suppressing and preventing fugitive dust at this facility. The 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 details on each measure are discussed in the plan.

Bed Ash Bunker. Dust is controlled by maintaining the moisture content of bed (or bottom) ash and controlling free fall heights as the material is loaded and removed from the bunker. The bunker's location and construction (concrete wing walls) protect against wind dispersion of material. **The operational and mechanical controls performed effectively, and periodic inspections 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 occurs, the material is immediately cleaned and disposed of before vehicle movement. **The operational and mechanical controls were performed effectively, and periodic inspections reported no issues. No modifications or changes in procedure are currently required.**

Onsite Disposal Truck Loading. Before loading fly ash into open container vehicles (dump trucks) for onsite disposal, the fly ash is moisture conditioned (average moisture contents range between 25 and 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 were performed effectively, and periodic inspections were reported with 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) water application, vehicle speed control, road maintenance, and periodic cleaning via an onsite street sweeper (paved roads). **The operational and suppression controls were**

performed effectively, and periodic inspections were reported with no issues. No modifications or changes in procedure are currently required.

CCR Landfill. Disposed ash material is moisture conditioned or moistened (with no free water) before loading or transport to the landfill. Disposed material is typically spread in thin lifts and compacted. Because the ash material is cementitious, it cures to a concrete-like material, which 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. **Operational and suppression controls were performed effectively, and periodic inspections 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 will be logged in the facility operating record, and the Environmental Supervisor will follow up and document any corrective action taken to address the complaint (as applicable). **The onsite Environmental Supervisor received no complaints during the period covered by this Annual Report, and no corrective actions were necessary.**

4.0 Plan Maintenance and Assessment

As provided in the Plan, the facility Environmental Manager (or similar official) should review the Plan every six (6) months or as necessary as new fugitive dust emissions are observed, suppression systems are modified, or the effectiveness of existing controls changes.

Under 40 CFR §257.80(b)(6), the facility must amend the Plan within 30 days of any change in conditions that substantially affects it. Technical amendments to the Plan should be reviewed and certified by a Professional Engineer in accordance with 30 TAC §352.801 and then placed 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.