

CCR Fugitive Dust Control Report

San Miguel Electric Cooperative, Inc.

Atascosa County, Texas

December 2, 2016

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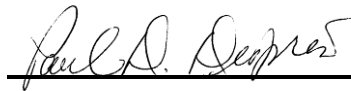
Project No. 0303548
Atascosa County, TX



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TABLE OF CONTENTS

1.0	INTRODUCTION	1
	1.1 DUST CONTROL REPORT REQUIREMENTS	1
	1.4 NOTIFICATION REQUIREMENTS	1
	1.5 RECORDKEEPING	2
	1.6 COMPLIANCE WITH OTHER REGULATORY REQUIREMENTS	2
2.0	POTENTIAL SOURCES OF CCR FUGITIVE DUST	3
	2.1 CCR FUGITIVE DUST CONTROL MEASURES	3
	2.2 CITIZEN COMPLAINTS	3
<i>Figure</i>		
	1 Site Plan	
<i>Table</i>		
	1 CCR Fugitive Dust Management and Control Measures	

1.0 INTRODUCTION

San Miguel Electric Cooperative, Inc. (San Miguel) owns and operates a 440-MW mine-mouth, lignite-fired generating plant and associated mining facilities in Christine, Texas. The plant generates coal combustion residuals (CCR) that are subject to regulation under Title 40, Code of Federal Regulations, Part 257 (40 CFR Part 257).

This is the Annual CCR Fugitive Dust Control Report for the period of October 2, 2015 to October 2, 2016. This report has been prepared in accordance with the air criteria requirements of the coal combustion residual management regulations promulgated in 40 CFR Part 257.80(c).

This report summarizes measures used to minimize and control CCR fugitive dust emissions, records of citizen complaints, and corrective measures taken for the reporting year. Information in this report is based upon our understanding of onsite dust control processes described in the *CCR Dust Control Plan* dated October 2, 2015 and implementation information gathered during an ERM interview with Ms. Mari Willis of San Miguel on December 1, 2016.

1.1 DUST CONTROL REPORT REQUIREMENTS

The coal combustion residual regulations promulgated in 40 CFR Part 257 require the owners and operators of CCR units to prepare an Annual CCR Fugitive Dust Control Report that includes the following information:

- Description of the actions taken by San Miguel during the reporting year to control fugitive dust;
- A record of all citizen complaints received during the calendar year; and
- A summary of any corrective measures taken in response to received citizen complaints.

1.4 NOTIFICATION REQUIREMENTS

San Miguel will notify the Executive Director of the TCEQ as defined in 40 CFR §257.105(d), and in accordance with 40 CFR §106(g)(2) when an Annual CCR Fugitive Dust Control Report is available in the San Miguel Plant Operating Record and publically accessible internet site.

In accordance with TCEQ instructions related to CCR units in Texas, San Miguel will send each notification to the TCEQ via internet electronic mail to:

CCRNotify@tceq.texas.gov

1.5 RECORDKEEPING

San Miguel will maintain record of this Annual CCR Fugitive Dust Control Report in the San Miguel Plant Operating Record and publically accessible internet site for a period of five years in accordance with 40 CFR §257.105(g)(2) and 105(g)(3).

1.6 COMPLIANCE WITH OTHER REGULATORY REQUIREMENTS

This report was prepared in accordance with the federal CCR dust control requirements found in 40 CFR Part 257.80(c) and is not intended to satisfy the requirements of any other regulation.

2.0 *POTENTIAL SOURCES OF CCR FUGITIVE DUST*

San Miguel handles CCR in various types of units. An aerial map of the facility is included as Figure 1. The San Miguel Plant Site Map depicts the areas where CCR is managed and dust control measures are implemented:

- Ash Pile (also known as the Sludge Pile);
- Ash Water Transport Ponds A and B (Ash Ponds);
- Equalization Pond; and
- Connecting roadways and other CCR management and material handling activities.

2.1 *CCR FUGITIVE DUST CONTROL MEASURES*

A summary of the San Miguel CCR Units and other areas where CCR fugitive dust may be encountered, the types of CCR material that are managed in those areas, and the measures used during the reporting period to minimize and control CCR fugitive dust is presented in Table 1.

2.2 *CITIZEN COMPLAINTS*

San Miguel received no citizen complaints related to CCR fugitive dust for the reporting period.

Table 1. CCR Fugitive Dust Management and Control Measures

CCR Unit	CCR Material Managed	Management Method	Dust Control Measures
Ash Ponds	<ul style="list-style-type: none"> • Fly ash • Bottom ash • Economizer ash • Pyrites 	<ul style="list-style-type: none"> • Wet CCR is piped from process through closed conveyances to the Ash Ponds. Because the material is wet while piped, airborne CCR is atypical. • Accumulated CCR that settles out of transport water is managed in an open aqueous pond system with surrounding berm. 	<ul style="list-style-type: none"> • San Miguel conducted daily visual inspections to verify that emission of windblown dust was managed and that liquid cover over the Ponds was maintained. • San Miguel conducted physical removal of accumulated CCR from the Ash Ponds in the spring of 2016 by using a submersible dredge. • San Miguel personnel responsible for CCR fugitive dust control reported that there was no observation of fugitive dust at the Ash Ponds during the 2016 reporting period.
Equalization Pond	<ul style="list-style-type: none"> • Flue Gas Desulfurization (FGD) Sludge • Fly ash 	<ul style="list-style-type: none"> • Wet CCR is piped from process through closed conveyances to the Equalization Pond. Because the material is wet while piped, airborne CCR is atypical. • Accumulated CCR that settles out of FGD effluent is managed in an open aqueous pond system with surrounding berm. 	<ul style="list-style-type: none"> • San Miguel conducted daily visual inspections to verify that emission of windblown dust was managed and that liquid cover over the Equalization Pond was maintained. • Physical removal of accumulated CCR from the Equalization Pond was initiated in the fall of 2016 and was ongoing through the end of the 2016 reporting period. • San Miguel personnel responsible for CCR fugitive dust control reported that there was no observation of fugitive dust at the Equalization Pond during the 2016 reporting period.
Ash Pile	<ul style="list-style-type: none"> • Flue Gas Desulfurization (FGD) Sludge • Fly Ash 	<ul style="list-style-type: none"> • Damp CCR is carried through closed conveyors and accumulated at the Ash Pile until it can be hauled for disposal off site. 	<ul style="list-style-type: none"> • San Miguel conducted daily visual inspections of the Ash Pile and conveyor system for visible dust emissions. • Conveyors are equipped with water sprayers that continuously kept the CCR moist as it was transported and stockpiled. • CCR accumulated at the Ash Pile was typically removed daily to reduce windblown dust. • Water trucks were used to apply water spray to the Ash Pile and surrounding area as needed to manually suppress dust.
Roadways and Other CCR Management & Material Handling	<ul style="list-style-type: none"> • Fly ash • Bottom ash • Economizer ash • Pyrites • Flue Gas Desulfurization (FGD) Sludge 	<ul style="list-style-type: none"> • Wet CCR is piped through closed conveyances to dewatering bins and transferred damp into haul trucks for disposal off site. • Fly Ash is stored and handled in closed silos and transferred to closed trucks for transport. 	<ul style="list-style-type: none"> • San Miguel conducted daily visual inspections at each CCR unit, other CCR handling operations, and the San Miguel facility roadways for visible dust emissions. • Water trucks were used daily, and more frequently as needed, to apply water spray to roadways and other areas where drying has caused apparent windblown dust. • CCR was transported damp in open trucks to reduce dust generated during transport. • Fly Ash was handled in closed silos and transported in closed trucks to reduce dust generated during transport.

Figure 1: San Miguel Site Map

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DESIGN: PD/CJ	DRAWN: EFC	CHKD.: .
DATE: 12/2/2016	SCALE: AS SHOWN	REVISION: 0

W.O.NOX\Austin\Projects\0361804 San Miguel Electric Groundwater Sampling-CCR.KPI\GIS\MXD\Fig1_SitePlan.mxd

FIGURE 1
 SITE PLAN
 CCR Fugitive Dust Control Report
 San Miguel Electric Cooperative, Inc. Facility
 Atascosa County, Texas

