

Annual CCR Fugitive Dust Control Report

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Atascosa County, TX

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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 Atascosa County, Texas. The plant generates coal combustion residuals (CCR) that are subject to regulation under Title 40, Code of Federal Regulations, Part 257 (40 CFR 257), known as the Coal Combustion Residual Rule (CCR Rule).

This is the Annual CCR Fugitive Dust Control Report for the period from October 3, 2016 to October 2, 2017.

This report has been prepared in accordance with the requirements of 40 CFR 257.80(c). Information in this report is based upon AECOM's understanding of San Miguel CCR fugitive dust sources and management methods, as described in the San Miguel CCR Dust Control Plan dated October 2, 2015, and implementation information gathered during an AECOM telephone interview of Mr. Mark Shilling (San Miguel Engineering Manager) and Mr. Jordan Jayashekaramurthy (San Miguel Environmental Engineer) on January 19, 2018.

1.1 DUST CONTROL REPORT REQUIREMENTS

The CCR Rule at 40 CFR 257.80(c) requires that owners and operators of CCR units prepare an Annual CCR Fugitive Dust Control Report that includes the following information:

1. A description of the actions taken by the owner or operator to control CCR fugitive dust
2. A record of all citizen complaints
3. A summary of any corrective measures taken

Item 1 above is addressed in Section 2.0 of this report. Item 2 is addressed in Section 3.0, and Item 3 is addressed in Section 4.0.

The deadline for completing annual CCR Fugitive Dust Control Reports is one year after the date of completing the previous report. The report is considered completed when the report has been placed in the facility operating record.

1.2 NOTIFICATION REQUIREMENTS

Per § 40 CFR 257.106(d) and § 106(g)(2) of the CCR Rule, San Miguel is required to submit a notification to the State Director (Executive Director of the Texas Commission for Environmental Quality (TCEQ)) within 30 days of placing the annual CCR Fugitive Dust Control Report in the operating record.

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.

1.3 RECORDKEEPING REQUIREMENTS

Per 40 CFR § 257.105(b) and § 105(g)(2) of the CCR Rule, San Miguel is required to maintain a copy of this report in the written operating record at the facility for a period of at least five years following the date of the report.

40 CFR § 257.107(d) and § 107(g)(2) requires that San Miguel post a copy of this report to the company's CCR Web Site within 30 days of placing the report in the operating record.

2.0 CCR FUGITIVE DUST CONTROL ACTIONS

40 CFR § 257.80(a) specifies that San Miguel must adopt measures to “minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities”. San Miguel manages CCR in the following CCR Units and other areas, which are potential sources of CCR fugitive dust.

- Ash Ponds (Ash Water Transport Ponds A and B)
- Equalization Pond (aka Sludge Disposal Basin)
- Ash Pile (aka Sludge Pile)
- Connecting roadways and other CCR management and material handling activities

Table 1 presents a list of San Miguel CCR Units and other areas where CCR fugitive dust may be encountered, the types of CCR material managed in those areas, CCR management methods, and the actions taken during the reporting period to control CCR fugitive dust.

3.0 CITIZEN COMPLAINTS

San Miguel did not receive any citizen complaints related to CCR fugitive dust during the reporting period.

4.0 CORRECTIVE ACTIONS

No corrective actions were taken in response to citizen complaints during the reporting period.

TABLE 1. CCR MANAGEMENT METHODS AND ACTIONS TAKEN TO CONTROL FUGITIVE DUST

CCR Units and Areas	CCR Materials Managed	CCR Management Methods	Actions Taken to Control CCR Fugitive Dust During the Reporting Period
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 the 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 dike. 	<ul style="list-style-type: none"> • Daily visual inspections to verify that emission of windblown dust was managed and that liquid cover over the Ponds was maintained. Results were recorded weekly. No fugitive dust was observed at the Ash Ponds during the inspections.
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 the 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 dike. 	<ul style="list-style-type: none"> • Daily visual inspections to verify that emission of windblown dust was managed and that liquid cover over the Equalization Pond was maintained. Results were recorded weekly. No fugitive dust was observed at the Equalization Pond during the inspections. • Physical removal of accumulated CCR from the Equalization Pond is ongoing. The most recent removal was completed on 10/26/2016. Solids were stacked for dewatering and removed using long reach excavators. Dump trucks were used to transport material to an onsite slurry pile for mine disposal.
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 off site for disposal. 	<ul style="list-style-type: none"> • Daily visual inspections of the Ash Pile and conveyor system for visible dust emissions. Results were recorded weekly. • Conveyors are equipped with a wet suppression spray system (water and chemical binding agents) that continuously kept the CCR moist as it was transported and stockpiled. • CCR accumulated at the Ash Pile was removed as needed to reduce windblown dust. • Water trucks were used to apply a water and chemical binding agent spray to the Ash Pile and surrounding area as needed to suppress dust.

CCR Units and Areas	CCR Materials Managed	CCR Management Methods	Actions Taken to Control CCR Fugitive Dust During the Reporting Period
Roadways and other CCR management and 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 off site. 	<ul style="list-style-type: none"> • Daily visual inspections at each CCR unit, other CCR handling operations, and the San Miguel facility roadways for visible dust emissions. Results are recorded weekly. • Water trucks were used as needed to apply water spray to roadways and other areas if drying had 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.