

**San Miguel Electric Cooperative, Inc. (SMECI)**

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**COAL COMBUSTION RESIDUAL  
DUST CONTROL PLAN  
CHRISTINE, TEXAS**

July 8, 2022



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**Bullock, Bennett & Associates, LLC  
Engineering and Geoscience  
Registrations: Engineering F-8542, Geoscience 50127  
[www.bbaengineering.com](http://www.bbaengineering.com)**

San Miguel Electric Cooperative, Inc.  
6200 FM 3387  
Christine, Atascosa County, Texas 78012

## **CCR Dust Control Plan**

July 8, 2022

BBA Project No. 20379

*Dan Bullock, P.E.*  
\_\_\_\_\_  
*Project Consultant*  
*Bullock, Bennett & Associates, LLC*

Prepared by:

**Bullock, Bennett & Associates, LLC**

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## RECORD OF TECHNICAL PLAN AMENDMENTS, REVISIONS OR REVIEWS

Technical amendments/revisions to this Dust Control Plan should be recorded here. A P.E. certification is required for technical changes and must be included on a new certification page - see Section 2.

Date	Prepared By:	Amendment/ Revision or Update	Summary of Changes to Plan and/or Update Observations	Pages or Sections Changed
10/02/2015	ERM	Initial	Initial Plan Issued	Entire Plan
1/14/2022	BBA	Update	Reflect the current status of the former Equalization Pond (also referred to as the East Equalization Pond - removed from service, capped with clay). Reflect the partition of Ash Pond B into two units, Ash Pond B (east half) and South Equalization Basin (west half)	Entire Plan
7/8/2022	BBA	Update	Removed "in response to received citizen complaints" when discussing corrective measures	Entire Plan

## **TABLE OF CONTENTS**

1.0	INTRODUCTION .....	1
1.1	DUST CONTROL PLAN REQUIREMENTS AND DEFINITIONS.....	1
1.2	MANAGEMENT OF THE PLAN.....	2
1.3	REPORTING REQUIREMENTS.....	2
1.4	NOTIFICATION REQUIREMENTS.....	3
1.5	COMPLIANCE WITH OTHER REGULATORY REQUIREMENTS.....	3
2.0	PROFESSIONAL ENGINEER'S CERTIFICATION.....	4
3.0	POTENTIAL SOURCES OF DUST AND CONTROL MEASURES.....	5

## **APPENDICES**

- A *Figure 1, Site Plan*
- B *Example Annual CCR Fugitive Dust Control Report*
- C *Example Citizen Complaint Log*

## 1.0 INTRODUCTION

San Miguel Electric Cooperative, Inc. (SMECI) 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 the United States Environmental Protection Agency (USEPA) CCR Rule, 40 CFR Part 257 (40 CFR Part 257). The federal CCR rules have been adopted by the Texas Commission on Environmental Quality (TCEQ) under 30 Texas Administrative Code (TAC) Chapter 352.

This document serves as the CCR Dust Control Plan (the Plan) for SMECI. The Plan is intended to satisfy the air criteria requirements of the coal combustion residual management regulations promulgated in 40 CFR Part 257.80.

This Plan requires SMECI to adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, CCR piles, roads, and other CCR management activities.

## 1.1 DUST CONTROL PLAN REQUIREMENTS AND DEFINITIONS

The coal combustion residual regulations promulgated in 40 CFR Part 257 require the preparation, certification and implementation of Dust Control Plans for all regulated CCR units. The requirement to prepare and implement this Plan is applicable to owners and operators of CCR units covered under the rule, including:

- New and existing landfills;
- New and existing surface impoundments;
- CCR units located off-site of the electric utilities' or independent power producers' facilities that receive CCR for disposal; and
- Certain inactive CCR surface impoundments if the CCR unit still contains CCR and liquids.

The Plan contains specific terms that are defined as follows in 40 CFR 257.53, Definitions:

- **Coal combustion residuals (CCR)** - means fly ash, bottom ash, boiler slag and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.
- **CCR fugitive dust** - means solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney.
- **CCR landfill** - means an area of land or an excavation that receives CCR and which is not a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground or surface coal mine, or a cave. For purposes of this subpart, a CCR landfill also includes sand and gravel pits and quarries that receive CCR, CCR piles, and any practice that does not meet the definition of a beneficial use of CCR.

- **CCR pile or pile** - means any noncontainerized accumulation of solid, non-flowing CCR that is placed on the land. CCR that is beneficially used offsite is not a CCR pile.
- **CCR surface impoundment** - means a natural topographic depression, manmade excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.
- **Facility** - means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, disposing, or otherwise conducting solid waste management of CCR. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).
- **Qualified professional engineer** - means an individual who is licensed by a state as a Professional Engineer to practice one or more disciplines of engineering and who is qualified by education, technical knowledge and experience to make the specific technical certifications required under this subpart. Professional engineers making these certifications must be currently licensed in the state where the CCR unit(s) is located.

## 1.2 MANAGEMENT OF THE PLAN

SMECI will periodically assess the effectiveness of this Plan through the following processes and amend the plan as appropriate:

- The plant will review the visual observation records of the affected CCR units. These visual observation records may indicate cause for additional or modified dust control measures.
- Physical or procedural changes to the CCR handling processes that may affect the effectiveness of this Plan will be identified and addressed following the Plant's "Management of Change" procedure.

SMECI will amend this Plan in accordance with the requirements of §257.80(b)(6) whenever a change that will substantially affect this written Plan, such as construction and operation of a new CCR unit. SMECI will amend this plan whenever necessary and place a copy of the current updated plan in the Operating Record in accordance with the Recordkeeping requirements of 5257.105(g)(1).

An amended Plan will be certified by a qualified professional engineer as in accordance with the requirements of §257.80(b)(7).

## 1.3 REPORTING REQUIREMENTS

SMECI will prepare an annual CCR fugitive dust control report that includes the following information:

- Description of the actions taken by SMECI 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.

An example annual CCR fugitive dust control report is included in Appendix B.

SMECI will log and record citizen complaints of fugitive dust using the log in Appendix C.

#### **1.4 NOTIFICATION REQUIREMENTS**

SMECI will notify the State Director as required under §257.106(g)(1) and (2) when the following documents are made available in the Operating Record:

- The initial and subsequent amendments to this Plan; and
- The annual CCR fugitive dust control report.

The chief administrative officer meeting the definition of the Texas State Director

Toby Baker  
Executive Director, MC 109  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

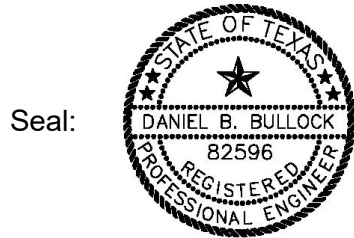
#### **1.5 COMPLIANCE WITH OTHER REGULATORY REQUIREMENTS**

This Plan is designed to comply with the federal CCR dust control requirements found in 40 CFR Part 257.80 and is not intended to incorporate procedures to fully comply with the requirements of any other regulation. The facility does not intend to duplicate or deviate from the requirements for fugitive dust control required under other regulations or permits such as the SMECI Title V and NSR air permits and Texas air quality regulations under 30 TAC Part 1, Chapter 111, Control of Air Pollution from Visible emissions and Particulate Matter.

**2.0 PROFESSIONAL ENGINEER'S CERTIFICATION**

40 CFR Part 257.80(b)(7) of the dust control regulations require that the dust control plan meets the requirements of the rule. This certification is provided below:

*"I hereby certify that I have reviewed the CCR unit management practices for the SMECI plant in Christine, Texas, and being familiar with the provisions of 40 CFR Part 257.80, attest that this Dust Control Plan has been prepared in accordance with good engineering practices."*



Daniel B. Bullock  
Printed Name of Registered Professional Engineer

A handwritten signature in black ink that reads "Daniel B. Bullock".

Signature of Registered Professional Engineer

Date: 7/08/2022

82596  
Registration No.

Texas  
State



### **3.0 POTENTIAL SOURCES OF DUST AND CONTROL MEASURES**

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

- Production areas;
- Ash (CCR) Pile;
- Ash Ponds A and B;
- South Equalization Basin; and
- Connecting roadways.

The regulated CCR Unit and the types of CCR material that may be managed in each unit during normal or contingent operations are presented in Table 3-1, CCR Fugitive Dust Management and Control Measures.

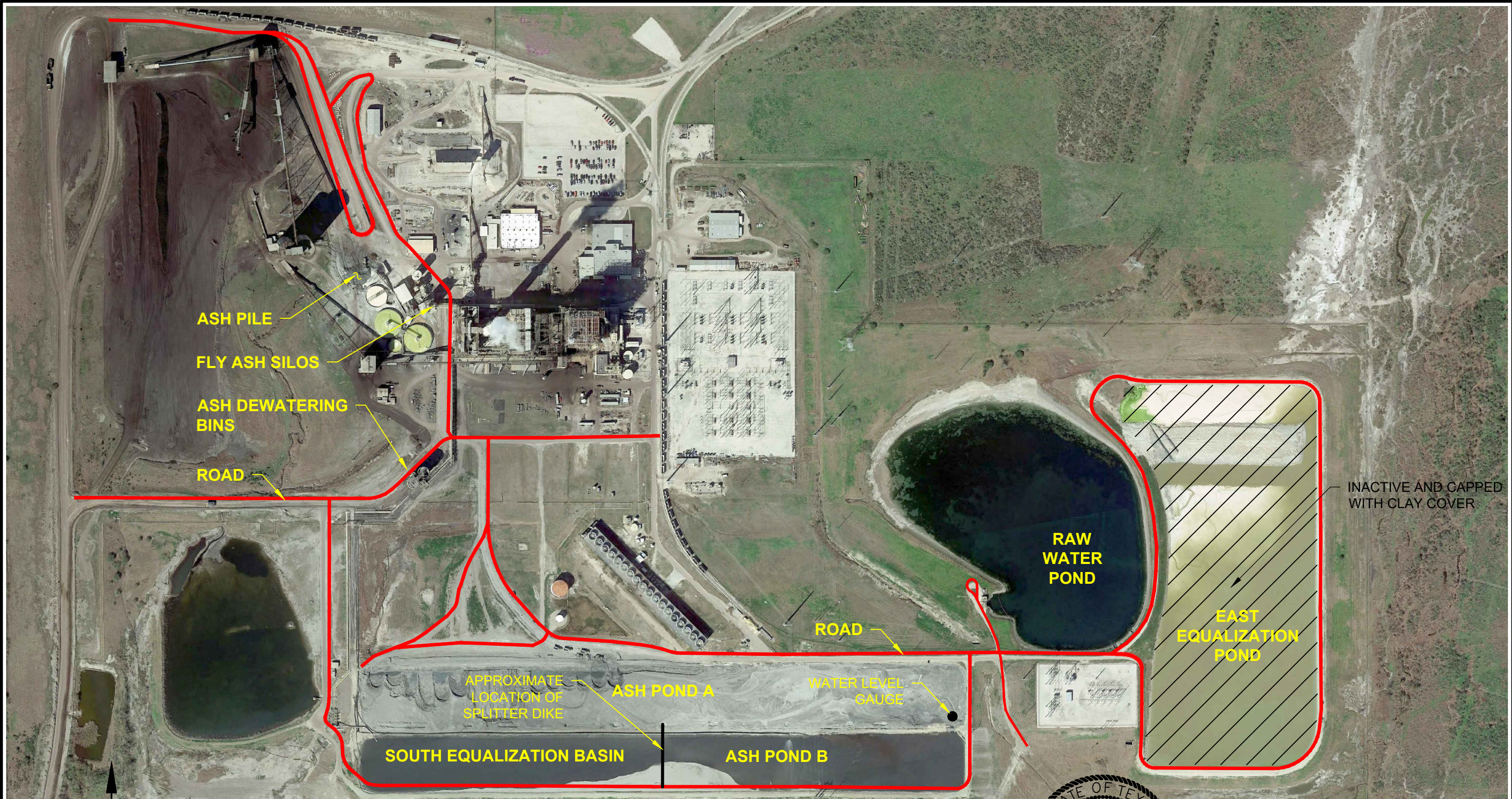
**Table 3-1. CCR Fugitive Dust Management and Control Measures**

CCR Unit	CCR Material Managed	Management Method	Dust Control Measure
Ash Water Ash Ponds A and B	Fly ash Bottom ash Economizer ash Pyrites	<ul style="list-style-type: none"> <li>• Piping wet material from process through closed conveyances</li> <li>• Store and processing material in an open aqueous pond system with surrounding berm</li> </ul>	<ul style="list-style-type: none"> <li>• Periodic visual inspections for emission of windblown dust, maintenance of liquid cover.</li> <li>• Apply water spray, mist or fog to areas where drying has caused apparent windblown dust</li> <li>• Use moisture or other conditioning agents to areas subject to drying and visible dust emissions.</li> </ul>
South Equalization Basin (aka Sludge Disposal Basin)	Flue Gas Desulfurization Sludge Fly ash	<ul style="list-style-type: none"> <li>• Piping wet material from process through closed conveyances</li> <li>• Store and processing material in an open aqueous pond system with surrounding berm</li> </ul>	<ul style="list-style-type: none"> <li>• Periodic visual inspections for emission of windblown dust, maintenance of liquid cover.</li> <li>• Apply water spray, mist or fog to areas where drying has caused apparent windblown dust on pond berms</li> <li>• Physical removal of dry CCR material and placement in wet systems</li> <li>• Use moisture or other conditioning agents to areas subject to drying and visible dust emissions.</li> </ul>
Ash (CCR) Pile and Other CCR Management & Material Handling	Fly ash Bottom ash Economizer ash Pyrites Flue gas desulfurization sludge	<ul style="list-style-type: none"> <li>• Storage and conveying wet and dry CCR material through closed conveyances and drop points to open CCR storage area</li> <li>• Storage and handling dry CCR material in bins and hoppers</li> <li>• Discharge of wet CCR material into trucks</li> </ul>	<ul style="list-style-type: none"> <li>• Apply water spray, mist or fog to areas where drying has caused apparent windblown dust</li> <li>• Inspect conveyances for leaks of CCR material that results in visible dust emissions</li> </ul>

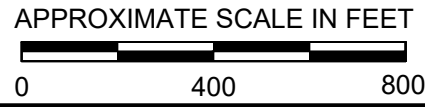
		<ul style="list-style-type: none"> <li>• Transferring wet CCR material into trucks and transporting inside the plant by truck</li> </ul>	<ul style="list-style-type: none"> <li>• Adjust CCR drop height or shroud as appropriate to minimize windblown dust from conveyor to open pile</li> <li>• Place only wet materials in open trucks for transport throughout the plant</li> <li>• Manual dust suppression along roadways using water or physical removal.</li> </ul>
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Note: The former Equalization Pond (aka East Equalization Pond) has been removed from service, capped with clay and therefore removed from Table 3-1.

**Figure 1: SMECI Site Map**  
***Appendix A***



Plot Date: 01/14/22 - 4:06pm, Plotted by: Admin  
 Drawing Path: K:\clients\bbat\San Miguel\20379\_ Drawing Name: C-ST-PL103\_PLEX EARTH.dwg



SOURCE: AERIAL BACKGROUND PROVIDED BY GOOGLE MAPS - PLEX EARTH (15cm resolution, 2-2019).

NOTE: AERIAL BACKGROUND PHOTO IS MOST RECENT AVAILABLE, BUT IS NOT CURRENT AND DOES NOT REFLECT CURRENT SITE CONDITIONS. PROVIDED FOR GENERAL INFORMATIONAL PURPOSES ONLY.



*Daniel B. Bullock*  
1-14-2022

**San Miguel Electric Cooperative Inc.**  
Atascos County, Texas

Figure 1

**SITE MAP - CCR FUGITIVE DUST CONTROL PLAN**

PROJECT: 20379 BY: RCAD-RR DATE: JAN 2022 CHECKED: DBB

**Bullock, Bennett & Associates, LLC**  
Engineering and Geoscience  
Texas Registrations: Engineering F-8542, Geoscience 50127

**Example Annual CCR Fugitive Dust Control Report**  
*Appendix B*



**Bullock, Bennett & Associates, LLC**

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**- EXAMPLE REPORT -**  
ANNUAL CCR FUGITIVE DUST CONTROL REPORT

SAN MIGUEL ELECTRIC COOPERATIVE, INC.

XXXXXX

Prepared for:

**San Miguel Electric Cooperative, Inc.**  
6200 FM 3387  
Christine, Atascosa County, Texas 78012

Prepared by:

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Texas Geoscience Firm Registration: 50127

BBA Project No. 20379

## TABLE OF CONTENTS

	<u>Page</u>
<b>1.0 INTRODUCTION .....</b>	<b>2</b>
<b>2.0 CCR FUGITIVE DUST CONTROL REQUIREMENTS.....</b>	<b>2</b>
<b>3.0 POTENTIAL CCR FUGITIVE DUST SOURCES .....</b>	<b>5</b>
<b>4.0 CCR FUGITIVE DUST CONTROL MEASURES .....</b>	<b>5</b>
<b>5.0 CITIZEN COMPLAINTS AND CORRECTIVE ACTIONS.....</b>	<b>9</b>

**Table 1 – CCR Fugitive Dust Management and Control Measures**

**Figure 1 – Site Map**



## 1.0 INTRODUCTION

Bullock, Bennett, and Associates, LLC (BBA) was retained by the San Miguel Electric Cooperative, Inc. (SMECI) to complete an on-site inspection and prepare the Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report. The SMECI lignite-fired 440-megawatt (MW) power plant and associated mining facilities are located approximately six miles south of Christine, in Atascosa County in South Texas. Properties surrounding the facility are primarily comprised of open rural agricultural farm and ranch land mixed with oil and gas production facilities.

This Annual CCR Fugitive Dust Control Report has been prepared in general accordance with requirements set forth under the United States Environmental Protection Agency (USEPA) CCR Rule, 40 Code of Federal Regulations (CFR) §257.80. The federal CCR rules have been adopted by the Texas Commission on Environmental Quality (TCEQ) under 30 Texas Administrative Code (TAC) Chapter 352. The purpose of this inspection report is to summarize measures implemented by SMECI to control CCR fugitive dust, provide a record of citizen complaints addressing fugitive dust (if any) and to review past corrective measures associated with control of fugitive dust.

BBA performed the inspection on October 26, 2021. During the inspection SMECI personnel were available to provide assistance with BBA's questions.

This Annual CCR Fugitive Dust Control Report covers the October 2, 2020 to October 2, 2021 operating and reporting period as required under 40 CFR §257.80(c).

## 2.0 CCR FUGITIVE DUST CONTROL REQUIREMENTS

The CCR regulations set forth in 40 CFR §257.80(c) require the owners and operators of CCR units to provide an Annual CCR Fugitive Dust Control Report that includes, at a minimum, the following information for the reporting year:

- Descriptions of actions and control measures used to control fugitive dust;
- A record of all citizen complaints received during the calendar year; and,
- A summary of all corrective measures taken.

In addition, owners and operators must comply with the following:

- Recordkeeping requirements as set forth in 40 CFR §257.105(g);
- Notification Requirements as forth in 40 CFR §106(g); and
- Publicly accessible internet site requirements as set forth in 40 CRF §257.107(g).

A summary of the CCR Fugitive Dust Control Plan requirements in 40 CFR §257.80 is as follows:

### §257.80 Air Criteria

- *(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively 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.*

- *(b) CCR fugitive dust control plan. The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.*

*(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.*

*(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.*

*(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.*

*(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.*

*(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than October 19,*

2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. The owner or operator has completed the initial CCR fugitive dust control plan when the plan has been placed in the facility's operating record as required by §257.105(g)(1).

- (6) Amendment of the plan. The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by §257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.
- (7) The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of the section.

(c) Annual CCR fugitive dust control report. The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by §257.105(g)(2).

(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(g), the notification requirements specified in §257.106(g), and the internet requirements specified in §257.107(g)

The annual CCR Fugitive Dust Control plan must be documented pursuant to the reporting requirements of 40 CFR §257.80(d):

- 40 CFR §257.80(d) *The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.106(g), and the internet requirements specified in §257.107(g).*

### **3.0 POTENTIAL CCR FUGITIVE DUST SOURCES**

SMECI operates various types of CCR producing units throughout the facility. Figure 1 depicts the potential CCR fugitive dust sources. The following potential CCR fugitive dust sources were inspected:

CCR Units:

- Ash Ponds A and B;
- South Equalization Basin;
- East Equalization Pond (removed from service and clay cap installed in 2021); and,
- Ash Pile.

Other CCR Management and Handling Areas:

- Fly Ash Silos
- Ash Dewatering Bins; and,
- Connecting roadways.

### **4.0 CCR FUGITIVE DUST CONTROL MEASURES**

The on-site visual inspection of the CCR units was performed by a BBA licensed professional engineer on October 26, 2021. Table 1 summarizes the visual observations made during inspection of areas with potential for CCR fugitive emissions, type of CCR material in the area, management methods, and control measures to reduce CCR fugitive dust.

Table 1  
CCR Fugitive Dust Management and Control Measures

CCR Areas	CRR Managed Material	Management Method	Dust Control Measures
Ash Ponds A and B	<ul style="list-style-type: none"> <li>• Fly Ash</li> <li>• Bottom Ash</li> <li>• Economizer Ash</li> <li>• Pyrites</li> </ul>	<ul style="list-style-type: none"> <li>• Wet CCR is piped from processes through enclosed conveyances to the Ash Ponds. Airborne CCR is unlikely due to the wet nature of the CCR.</li> <li>• Accumulated CCR that settles out of transport water is managed in the pond system.</li> </ul>	<ul style="list-style-type: none"> <li>• SMECI personnel perform daily inspections of the CCR Ash Ponds A and B for fugitive dust emissions and to ensure a liquid cover is maintained within the ponds.</li> <li>• Water trucks are used to spray Ash Ponds A and B on an as-needed basis to prevent windblown fugitive emissions.</li> <li>• At the time of inspection Ash Ponds A and B were maintained with a liquid cover, there were no observations of fugitive dust during the annual inspection.</li> </ul>
South Equalization Basin	<ul style="list-style-type: none"> <li>• Flue Gas Desulfurization (FGD) Sludge</li> <li>• Fly Ash</li> </ul>	<ul style="list-style-type: none"> <li>• Wet CCR is piped from processes through enclosed conveyances to the South Equalization Basin. Airborne CCR is unlikely due to the wet conditions of the CCR.</li> <li>• Accumulated CCR that settles out of FGD effluent will be managed in the pond system.</li> </ul>	<ul style="list-style-type: none"> <li>• SMECI personnel perform daily inspections of the South Equalization Basin for fugitive dust emissions and to ensure a liquid cover is maintained within the basin.</li> <li>• Water trucks are used to spray the basin on an as-needed basis to prevent windblown fugitive emissions.</li> <li>• At the time of inspection the South Equalization Basin was being maintained with a liquid cover, there were no observations of fugitive dust during the annual inspection.</li> </ul>
(former) East Equalization Pond	<ul style="list-style-type: none"> <li>• Flue Gas Desulfurization (FGD) Sludge</li> <li>• Fly Ash</li> </ul>	<ul style="list-style-type: none"> <li>• The former East Equalization Pond was out of service and approximately 90% covered with a clay cap system at time of inspection.</li> <li>• Wet CCR was historically piped from processes through enclosed conveyances to the East Equalization Pond.</li> <li>• Accumulated CCR that settled out of FGD effluent was formerly managed in the pond system prior to removal of the pond from service.</li> </ul>	<ul style="list-style-type: none"> <li>• SMECI personnel performed daily inspections of the East Equalization Pond prior to capping to confirm there was no windblown dust.</li> <li>• Clay cap construction was initiated in 2020 and observed to be approximately 90% complete at time of inspection.</li> <li>• Dust prevention measures that would be used at the East Equalization Pond if-needed (prior to capping) would include the use of a water truck on the perimeter berm road and the installation of a sprinkler system to wet the material within the pond.</li> <li>• There were no observations of fugitive dust during the annual inspection.</li> </ul>
Ash Pile	<ul style="list-style-type: none"> <li>• Flue Gas Desulfurization (FGD) Sludge</li> <li>• Fly Ash</li> </ul>	<ul style="list-style-type: none"> <li>• CCR is dampened and transferred through enclosed conveyors and stockpiled at the Ash Pile for future handling and off-site disposal.</li> </ul>	<ul style="list-style-type: none"> <li>• SMECI personnel perform daily visual inspections of the Ash Pile and conveyor system for fugitive dust emissions.</li> <li>• Ash conveyors are equipped with a wet suppression spray system that keeps the CCR moist while transported and stockpiled.</li> <li>• CCR is normally removed from the Ash Pile on a daily basis to manage stockpiled ash material and limit windblown dust.</li> </ul>

			<ul style="list-style-type: none"> <li>• A partially enclosed conveyor system is used to reduce windblown dust.</li> <li>• A front-end loader is used to keep the ash in a uniform stockpile.</li> <li>• Water trucks are used to spray the Ash Pile on an as-needed basis to prevent windblown fugitive emissions.</li> <li>• The repairs made to the south steel containment wall in October of 2018 appears to be operating as designed.</li> <li>• There were no observations of fugitive dust during the annual inspection.</li> </ul>
Other Management Areas (Fly Ash Silos & Ash Dewatering Bins)	<ul style="list-style-type: none"> <li>• Fly Ash</li> <li>• Bottom Ash</li> <li>• Economizer Ash</li> <li>• Pyrites</li> <li>• Flue Gas Desulfurization (FGD) Sludge</li> </ul>	<ul style="list-style-type: none"> <li>• Wet methods are used to control CCR while piped through closed conveyances to dewatering bins.</li> <li>• Moist CCR is transferred to haul trucks for off-site disposal.</li> <li>• Fly Ash is stored in closed silos and transferred in enclosed trucks.</li> </ul>	<ul style="list-style-type: none"> <li>• SMECI personnel performed daily visual inspections of the CCR units and CCR handling operations.</li> <li>• Water trucks were used to apply water as needed to connecting roadways within the plant area to prevent windblown fugitive dust.</li> <li>• Fly Ash is staged in enclosed silos and Ash Dewatering Bins. A portion of the Fly Ash is sold and transported off-site in enclosed trucks to reduce potential for fugitive dust emissions. Ash from the Ash Dewatering Bins is transported in a moist condition to the mine landfill.</li> <li>• There were no observations of fugitive dust during the annual inspection.</li> </ul>

<p>Connecting Roadways</p>	<ul style="list-style-type: none"> <li>• Fly Ash</li> <li>• Bottom Ash</li> <li>• Economizer Ash</li> <li>• Pyrites</li> <li>• Flue Gas Desulfurization (FGD) Sludge</li> </ul>	<ul style="list-style-type: none"> <li>• Wet CCR is piped through closed conveyances to dewatering bins and transferred moist into haul trucks for off-site disposal.</li> <li>• Fly Ash is stored and handled in closed silos and transferred to enclosed trucks for transport off-site.</li> </ul>	<ul style="list-style-type: none"> <li>• SMECI personnel performed daily inspections of the connecting roads and associated CCR Units for visible fugitive dust emissions.</li> <li>• Water trucks were used to apply water to connecting roads and surrounding areas on a as-needed basis to prevent fugitive emissions.</li> <li>• Low vehicle speeds are maintained on connecting roadways and throughout the plant to minimize windblown dust.</li> <li>• There were no observations of fugitive dust during the annual inspection.</li> </ul>
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## 5.0 CITIZEN COMPLAINTS and CORRECTIVE ACTIONS

SMECI did not receive citizen complaints with regard to CCR fugitive dust during the 2021 reporting period. No corrective actions were implemented.

I, Dan Bullock, certify under penalty of law that the information submitted in this inspection report was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the state of Texas. The information submitted, is to the best of my knowledge and belief, true, accurate and complete.

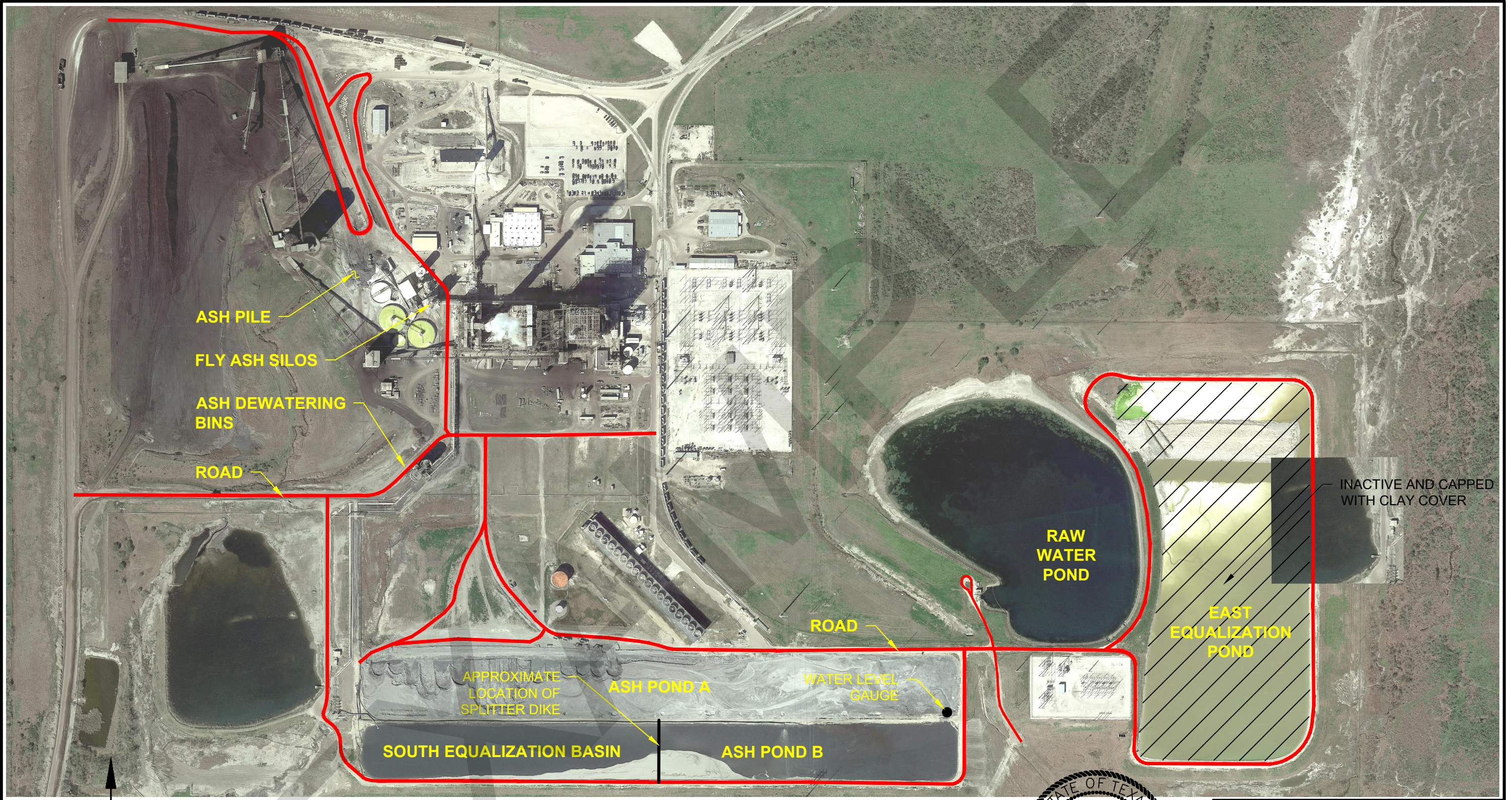
Dan Bullock, PE  
Texas PE No. 82596, Expires: XXXXX  
Date: XXXXXX



ATTACHMENT

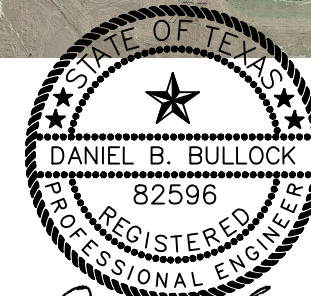
- Figure 1 – Site Map

Plot Date: 01/10/22 - 1:39pm, Plotted by: Admin  
Drawing Path: K:\clients\bbat\San Miguel\20379\_ Drawing Name: C-ST-PL103 PLEX EARTH.dwg



SOURCE: AERIAL BACKGROUND PROVIDED BY GOOGLE MAPS - PLEX EARTH (15cm resolution, 2-2019).

NOTE: AERIAL BACKGROUND PHOTO IS MOST RECENT AVAILABLE, BUT IS NOT CURRENT AND DOES NOT REFLECT CURRENT SITE CONDITIONS. PROVIDED FOR GENERAL INFORMATIONAL PURPOSES ONLY.



*Daniel B. Bullock*  
1-10-2022

San Miguel Electric Cooperative Inc.  
Atascosas County, Texas

Figure 1

**SITE MAP - CCR FUGITIVE DUST CONTROL REPORT**

PROJECT: 20379 BY: RCAD-RR DATE: JAN 2022 CHECKED: DBB

Bullock, Bennett & Associates, LLC  
Engineering and Geoscience  
Texas Registrations: Engineering F-8542, Geoscience 50127

**Example Citizen Complaint Log**  
*Appendix C*

**Citizen Complaint Log – Fugitive Dust Emissions**

**SMECI**

**Christine, TX**

Date & Time Complaint Received	
Person Receiving Complaint	
Method Complaint Registered or Received	
Description of Complaint	
Area of Site Originating Complaint (if applicable)	
Corrective Action Description and Timetable (if applicable)	
Follow-Up Actions (if applicable)	