



# **ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

**San Miguel Electric Cooperative, Inc.**  
Christine, Atascosa County, Texas

**Prepared for:**  
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This Inspection Report was prepared by the staff of GSI Environmental Inc., under the direct supervision of the professionals whose signatures appear hereon.

The findings, recommendations, specifications, or professional opinions were prepared in accordance with generally accepted professional practice.



A handwritten signature in black ink, appearing to read "J. McDade", written over a horizontal line.

13 October 2026

James M. McDade, P.E.  
State of Texas Registration No. 115868  
GSI Environmental Inc.  
Registered Engineering Firm No. F-1198

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## **Annual CCR Fugitive Dust Control Report**

### **San Miguel Electric Cooperative, Inc.**

Christine, Atascosa County, Texas

## **1.0 INTRODUCTION**

On behalf of San Miguel Electric Cooperative, Inc. (San Miguel), GSI Environmental Inc. (GSI) has prepared this Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report for the San Miguel Electric Plant (the San Miguel Plant or Plant) located near Christine, Atascosa County, Texas. This report, prepared in general accordance with requirements specified in 40 Code of Federal Regulations (CFR) 257.80(c) and 30 Texas Administrative Code (TAC) 352.801 (which incorporates 257.80 by reference), summarizes the following:

- Measures implemented by San Miguel to control CCR fugitive dust,
- Records of citizen complaints addressing fugitive dust (if any), and
- Any corrective measures taken by San Miguel.

This Annual CCR Fugitive Dust Control Report covers the operating and reporting period of 2 October 2025 to 2 October 2026, as required under 40 CFR 257.80(c). GSI performed the site inspection on 1 October 2026. During the inspection, San Miguel personnel were available to answer GSI's questions.

## **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 set forth in 40 CFR 106(g); and
- Publicly accessible internet site requirements as set forth in 40 CFR 257.107(g).

Specific regulatory requirements of the CCR Fugitive Dust Control Plan are as follows per 40 CFR 257.80:

### **40 CFR 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).*

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

The San Miguel Plant has three units used for the management of CCR that are subject to requirements in 40 CFR Part 257, Subpart D and 30 TAC 352:

- Ash Pile,
- Combined Ash Transport Ponds (Ash Ponds), and
- East Equalization Pond.

San Miguel closed the East Equalization Pond in 2022, which consisted of dewatering, grading, compaction of sediment, and installation of a final cap system; therefore, the East Equalization Pond no longer serves as a potential fugitive dust source.

The following potential CCR fugitive dust sources were inspected at the Plant (Figure 1):

#### *Active CCR Units*

- Ash Ponds A and B;
- South Equalization Basin; 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 representative of the registered professional engineer from GSI on 1 October 2026. The San Miguel Plant initiates dust control measures including, but not limited to, utilization of wet suppression spray systems, management of dry CCR in enclosed vessels only, and application of water spray on as as-needed basis.

At the time of inspection, necessary dust control measures were in operation, and no observations of fugitive dust were made. Table 1 summarizes the observations made during inspection of each potential source area including the type of CCR material managed, management methods, and control measures implemented to reduce CCR fugitive dust.

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

| CCR Areas                | CCR Managed Material                                  | Management Method                                                                               | Dust Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ash Ponds A and B        | Bottom ash, economizer ash                            | The Ash Ponds receive wet CCR from plant processes through enclosed conveyances                 | <ul style="list-style-type: none"> <li>• Daily inspections by San Miguel personnel to ensure a liquid cover is maintained</li> <li>• Water truck spray utilized as needed</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| South Equalization Basin | Flue gas desulfurization (FGD) scrubber wastewater    | The South Equalization Basin receives wet CCR from plant processes through enclosed conveyances | <ul style="list-style-type: none"> <li>• Daily inspections by San Miguel personnel to ensure a liquid cover is maintained<sup>1</sup></li> <li>• Water truck spray utilized as needed</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Ash Pile                 | Stabilized mixture of fly ash and FGD scrubber sludge | The Ash Pile receives wet CCR from plant processes through partially enclosed conveyances       | <ul style="list-style-type: none"> <li>• Daily inspections by San Miguel personnel to ensure no fugitive dust emissions</li> <li>• The ash conveyor system is partially enclosed and includes a wet suppression spray system</li> <li>• The Ash Pile containment walls are equipped with a wet suppression spray system that uses a chemical dust suppressant and is utilized on an as needed basis<sup>2</sup></li> <li>• A front-end loader is used to keep ash in a uniform stockpile</li> <li>• Ash is loaded into haul trucks and transported to the mine, typically on a daily basis</li> <li>• Water truck spray utilized as needed</li> </ul> |
| Fly Ash Silos            | Fly ash                                               | The Fly Ash Silos receive CCR through enclosed conveyances from the electrostatic precipitator  | <ul style="list-style-type: none"> <li>• Daily inspections by San Miguel personnel to ensure no fugitive dust emissions</li> <li>• Ash is staged in enclosed silos and transported off-site in enclosed trucks</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                             |

| CCR Areas           | CCR Managed Material                                     | Management Method                                                                                                                        | Dust Control Measures                                                                                                                                                                                                                          |
|---------------------|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                                                          |                                                                                                                                          | <ul style="list-style-type: none"> <li>Water truck spray utilized as needed</li> </ul>                                                                                                                                                         |
| Ash Dewatering Bins | Bottom ash and economizer ash                            | The Ash Dewatering Bins receive wet CCR from the boiler through enclosed conveyances                                                     | <ul style="list-style-type: none"> <li>Daily inspections by San Miguel personnel to ensure no fugitive dust emissions</li> <li>Ash is transported off-site in a moist condition</li> <li>Water truck spray utilized as needed</li> </ul>       |
| Connecting Roadways | Fly ash, bottom ash, economizer ash, FGD scrubber sludge | Moist CCR is transported in haul trucks for off-site disposal in the mine. Dry CCR (fly ash) is transported off-site in enclosed trucks. | <ul style="list-style-type: none"> <li>Daily inspections by San Miguel personnel to ensure no fugitive dust emissions</li> <li>Low vehicle speeds are maintained throughout the Plant</li> <li>Water truck spray utilized as needed</li> </ul> |

**Notes:**

- At the time of the inspection, the South Equalization did not have a full liquid cover on the west side of the pond. However, the exposed CCR was moist, and therefore, unlikely to become airborne. Additionally, San Miguel personnel were actively pumping water from the east side of the pond to the west side to maintain the liquid cover and distribute the accumulated CCR throughout the pond.
- At the time of inspection, the dust suppression system on the Ash Pile containment walls was undergoing maintenance. San Miguel personnel confirmed completion of the maintenance and proper functioning of the system the same day the inspection was complete. GSI confirmed this with a review of a photo of the system operating on 1 October 2026.

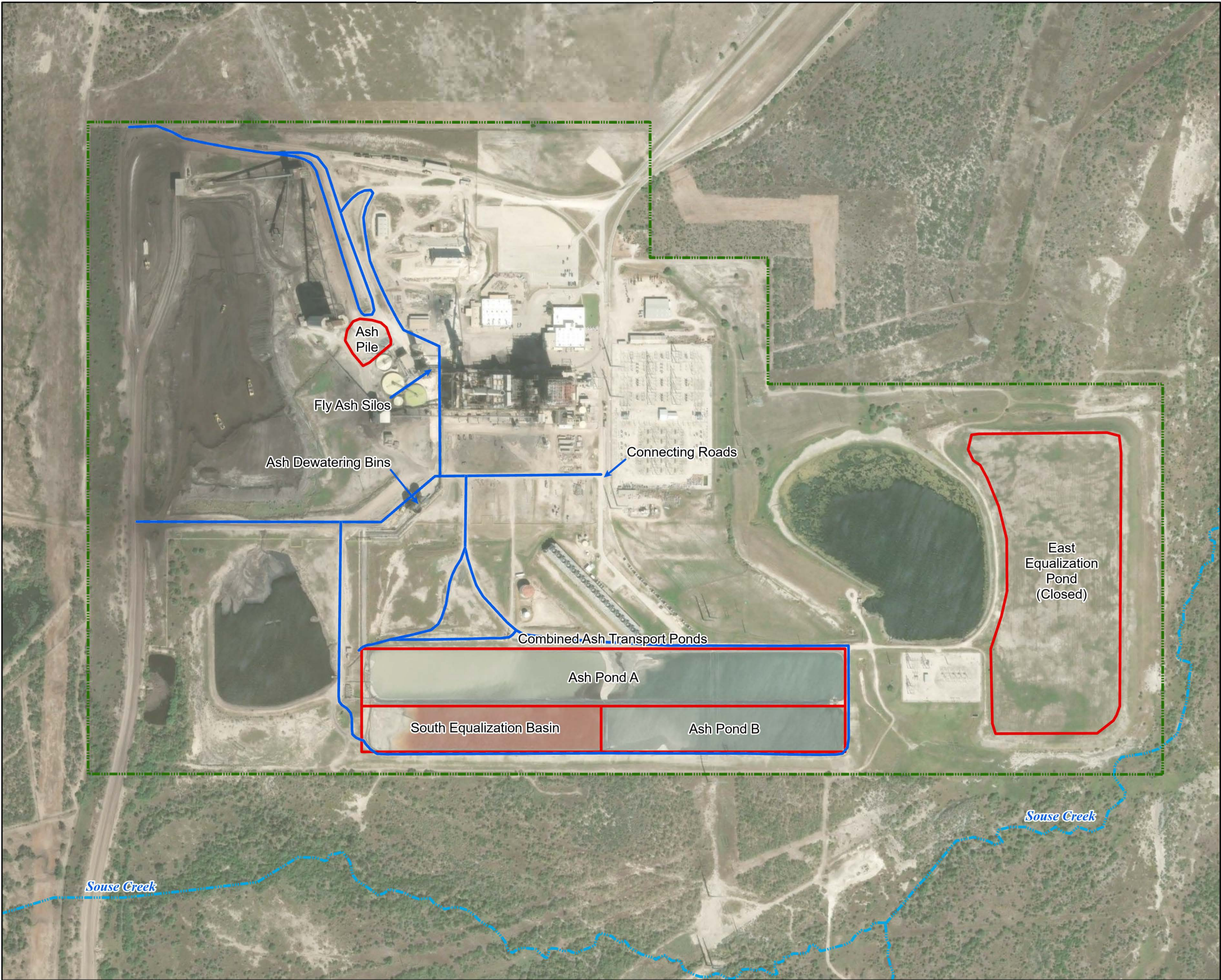
## 5.0 CITIZEN COMPLAINTS AND CORRECTIVE ACTIONS

The San Miguel Plant did not receive citizen complaints regarding CCR fugitive dust during the reporting period. No corrective actions were implemented; however, standard inspections and maintenance of all CCR management areas are completed routinely.

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Christine, Atascosa County, Texas

**FIGURES**

Figure 1 Potential CCR Fugitive Dust Sources

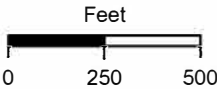


**LEGEND**

- CCR Management Areas
- Rivers
- Approximate Plant Property Boundary
- Regulated CCR Impoundment

**Notes**

1. Aerial imagery provided by Esri ArcGIS Online, July 2018.



Projected Coordinate System  
Datum: NAD 83  
State Plane Texas South Central  
Units: Feet



**POTENTIAL CCR FUGITIVE DUST SOURCES**

San Miguel Electric Cooperative, Inc. Plant  
Atascosa County, Texas

|             |             |            |     |
|-------------|-------------|------------|-----|
| GSI Job No. | 5076        | Drawn By:  | EN  |
| Issued:     | 12 Oct 2026 | Chk'd By:  | CRP |
| Map ID:     | SiteMap     | Appv'd By: | MLS |

**FIGURE 1**