

COAL COMBUSTION RESIDUALS ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Colorado Springs Utilities' Clear Spring Ranch
Coal Combustion Residuals Landfill
El Paso County

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Prepared By:
Colorado Springs Utilities
Energy Supply Division
Nixon Materials Handling Section

1.0 INTRODUCTION

The Environmental Protection Agency (EPA) has established national regulations within Title 40 of the Code of Federal Regulations [40 CFR Parts 257 and 261] that provide a comprehensive set of requirements for the disposal of Coal Combustion Residuals (CCR), commonly known as coal ash, from coal-fired power plants. These regulations, often referred to as the CCR Rule, contain provisions that are applicable to Colorado Springs Utilities' Clear Spring Ranch CCR Landfill located in El Paso County.

The purpose of this report is to satisfy the requirements of § 257.80 (c), which states that the owner or operator of a CCR unit must prepare an Annual CCR Fugitive Dust Control Report (Annual 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.

2.0 REPORTING PERIOD

The initial CCR Fugitive Dust Control Plan was completed then placed in the facility's operating record on October 19, 2015; as required under § 257.80(b)(5). This initial Annual Report was completed no later than 14 months after placing the initial CCR Fugitive Dust Control Plan in the facility's operating record (i.e., completed by December 19, 2016); as required under § 257.80(c). The deadline for completing the next Annual Report is one year after the date of completing the previous report; as required under § 257.80(c).

The reporting period for this Annual Report is October 20, 2015 through October 19, 2016. This initial Annual Report shall be considered part of the facility's operating record on December 19, 2016. The next Annual Report shall be prepared for the reporting period of October 20, 2016 through October 19, 2017, and should be placed in the facility's operating record on December 19, 2017.

3.0 ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

Colorado Springs Utilities adhered to the CCR Fugitive Dust Control Plan dated October 2015 during the entire reporting period. The fugitive dust control measures implemented during the reporting period primarily consisted of the following:

3.1 Conditioned CCR

The mechanical CCR conditioning systems in place at both the Drake and Nixon Power Plants were utilized; therefore, CCR was loaded into trucks as conditioned CCR prior to transport to the CCR Landfill.

3.2 Daily Checks

Daily checks of the on-site haul roads, unloading areas, final placement activities, and overall CCR Landfill were conducted by the Plan Coordinator, or their designee(s), to monitor whether fugitive dust was being generated and to ensure conditioned CCR was being emplaced. Actions required to control a fugitive dust problem identified by the daily observations were recorded in a written or electronic facility log.

3.3 Truck Covering

Trucks transporting CCR were covered to reduce the potential for emissions of fugitive dust and spillage while in transit to the CCR Landfill.

3.4 Unpaved Roads - Watering

Unpaved roadways on-site were watered to control fugitive emissions, as necessary.

3.5 Reduced Vehicle Speed

Vehicle speeds on unpaved roadways on-site were limited to a maximum of 15 miles per hour via appropriate signage. The speed limit was enforced by the Plan Coordinator, or their designee(s), as necessary.

3.6 Deposit of Dirt and Mud on Improved Streets

CCR spillage on roads was cleaned up in a timely manner, if necessary.

3.7 Material Unloading / Final Placement / Cover / Re-vegetation

When at the CCR Landfill, trucks were unloaded slowly and at the lowest height possible. Water spray was used if material unloading and/or final placement activities were resulting in significant fugitive dust emissions; and also used to provide further "CCR conditioning", if needed. Water spray as required, or 6 inches of soil cover was used daily to prevent fugitive emissions from CCR landfill areas that had not yet had final cover applied.

3.8 Additional Measures Implemented During the Reporting Period

- The Plan Coordinator had two material handling personnel dedicated seven days a week to monitoring, observing, and working the landfill. The Plan Coordinator rotated these material handling personnel monthly to ensure all crew members had up to date knowledge of the landfill operations.
- Material Handling Personnel adequately observed the CCR removal, stockpiling, and loading activities associated with “beneficial use” during the reporting period for fugitive dust emissions. The bottom ash reclaimed is fairly moist; therefore, minimal water spray was needed for dust suppression during removal, stockpiling, and loading activities. The material was removed, as needed, to minimize long-term exposure to wind and weather. The related roads and loading area were watered, as needed, to minimize fugitive dust emissions.
- The Plan Coordinator set-up and received text messages and email notifications from a weather station within Clear Spring Ranch to assist with control measure implementation and/or to aid in determining if CCR Landfill operations should be reduced / halted.
- Colorado Springs Utilities purchased a new Caterpillar D8 Dozer with GPS satellite mapping for use at the CCR Landfill. This system should aid in minimizing material handling / re-handling; thereby minimizing the potential for fugitive dust.

4.0 EFFECTIVENESS ASSESSMENT

Colorado Springs Utilities must periodically assess the effectiveness of the CCR Fugitive Dust Control Plan [257.80(b)(4)]. An effectiveness assessment was performed by the Plan Coordinator in conjunction with the preparation of this Annual Report using the procedures described in Section 7.0 of the CCR Fugitive Dust Control Plan, or similar approach.

The Plan Coordinator considered the existing CCR Fugitive Dust Control Plan dated October 2015 to be effective and that no modification / alterations to the plan appeared required. Nonetheless, with consultation from Colorado Springs Utilities’ Environmental Services Division it was considered beneficial to augment the plan by including CCR removal, stockpiling, and loading activities associated with “beneficial use” as potential CCR fugitive dust sources at the CCR Landfill. Colorado Springs Utilities, therefore, amended the CCR Fugitive Dust Control Plan (Revision dated December 19, 2016).

5.0 CITIZEN COMPLAINTS AND CORRECTIVE MEASURES

The process by which Colorado Springs Utilities would receive and respond to citizen complaints related to fugitive dust events at the CCR landfill is defined in Section 5.0 of the CCR Fugitive Dust Control Plan.

No citizen complaints were received during the reporting period, and as such no corrective measures were required.