

SCS ENGINEERS

November 30, 2017
SCS Project No. 16215106.00

Mr. Darryl Sparks, Compliance Manager
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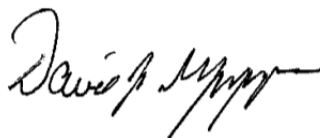
(sent via email)

Subject: Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report
Sandy Creek Energy Station
Riesel, McClennan County, Texas

Dear Darryl:

Please find attached the subject report for the Sandy Creek Energy Station for the period of November 20, 2016 through November 19, 2017. Please feel free to contact either of the undersigned with any questions or comments.

Sincerely,

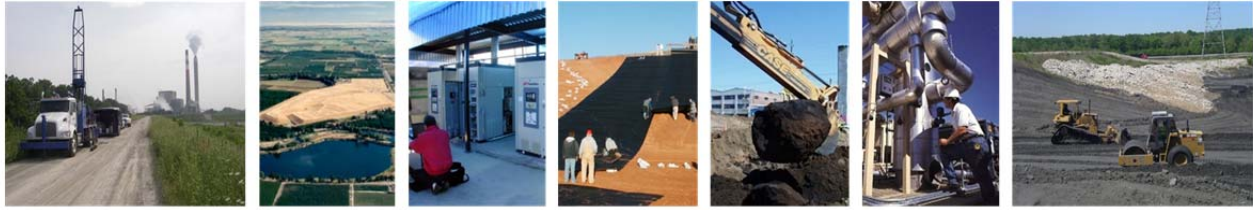


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Attachment



**ANNUAL COAL COMBUSTION
RESIDUALS (CCR) FUGITIVE DUST
CONTROL REPORT**

**SANDY CREEK ENERGY STATION
RIESEL, TEXAS**

Prepared for:

SANDY CREEK SERVICES, LLC
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Prepared by:

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1.0 INTRODUCTION

This annual coal combustion residuals (CCR) fugitive dust control report (annual report) has been prepared for the Sandy Creek Energy Station (facility), a coal-fired power plant located in Riesel, McLennan County, Texas for the period of November 20, 2016 through November 19, 2017.

This annual report is required by 40 CFR 257.80(c) which states that, “the facility 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.” This annual report has been prepared to meet these requirements.

2.0 ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

Actions taken to control CCR fugitive dust during the reporting period followed the CCR fugitive Dust Control Plan. These measures are summarized in the following sections.

2.1 Bottom Ash Fugitive Dust Control Measures

Bottom ash includes the conveyance of bottom ash (including a small portion of ash from the economizer) into the storage area adjacent to the power house and storage area management/housekeeping. Dust control measures that may be used for this portion of the facility’s operation are as follows:

- Bottom ash residues accumulate inside the power house/enclosed system prior to being dropped from a chute into the storage area;
- Bottom ash is wetted from the quench water and effectively pre-conditioned prior to being dropped into the storage area;
- The character of the bottom ash is that it consists of larger particles and is less prone to creating fugitive dust;
- The wetted bottom ash is deposited onto a concrete pad and into an area surrounded by tall concrete walls on three sides, thereby creating a wind shield;
- Bottom ash is routinely removed before it dries from the enclosure thereby minimizing concerns with dust at this location; and
- The enclosure area is periodically cleaned with water, thereby further minimizing concerns with CCR dust becoming airborne.

2.2 Scrubber Ash Fugitive Dust Control Measures

Scrubber ash operations for this facility include scrubber ash conveyance through the spray-dry absorber, discharged out the bottom of the storage silo into transfer trucks, and the silo yard (immediate area around the silo transfer area). Dust control measures used for this portion of the facility’s operation include the following:

- Equipment from the boiler and other equipment to the silo and spray-dry absorber is

- completely enclosed;
- The pug mill at the bottom of the silo adds moisture prior to dropping the scrubber ash into the transfer trucks;
- A chute at the bottom of the silo decreases the fall distance of the ash into the transfer trucks;
- Trucks are loaded from the bottom of the silo in a tunnel (partially enclosed);
- The silo yard and silo interior are sprayed with water periodically and cleaned to control dust from ash that may accumulate around the immediate silo area; and
- Ash from the spray-dry absorber is discharged onto a concrete pad inside of an area comprised of several perimeter barriers and removed for disposal. During loading, a water truck is used to wet down the ash as it is loaded into a front end loader and then onto an awaiting truck. This area is periodically cleaned to control dust that may accumulate in the immediate drop area.

2.3 Ash Transport Fugitive Dust Control Measures

Both bottom ash and scrubber ash are conveyed to the CCR landfill. This subsection encompasses the operation from placing the ash into the trucks through the material arriving at the CCR landfill. Dust control measures used for this portion of the facility's operation include the following:

- Scrubber ash from the silo falls from a chute into the transfer trucks to lower the fall distance;
- Scrubber ash from the silo is conditioned with water in the pug mill prior to dropping it into the transfer truck;
- Transfer trucks are high walled and are not overfilled to minimize dust emissions;
- The size and moisture content of the bottom ash particles, when loaded into transfer trucks for hauling to the CCR landfill, reduces the potential for creating fugitive dust;
- The road to the CCR landfill is graded periodically;
- A maximum 15 mile-per-hour speed limit is observed on the road to the CCR landfill (signage is currently in-place); and
- The road to the CCR landfill is periodically watered, as needed, to control dust.

2.4 CCR Landfill Fugitive Dust Control Measures

This subsection covers the landfilling of CCR materials at the CCR landfill. Dust control measures used for this portion of the facility's operation include the following:

- The CCR material is conditioned as it is landfilled;
- The conditioned ash will be compacted during placement;
- Facility roads to the CCR landfill will be watered as necessary to minimize airborne dust;
- The maximum size of certain CCR landfill areas will be controlled (active area no larger than one acre, exposed disposal surfaces no larger than five acres);
- The nature of the scrubber ash is such that when moistened a harder top layer develops

- which is utilized as necessary to decrease dust generation due to wind erosion; and
- A protective cover layer of soil or bottom ash over scrubber ash is also used on the CRR landfill to minimize wind erosion.

3.0 SUMMARY OF CITIZEN COMPLAINTS

There were no citizen complaints relating to CCR dust events at the site during this reporting period.

4.0 CORRECTIVE ACTIONS TAKEN

No corrective measures regarding CCR fugitive dust were taken during the reporting period.