



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

**SANDY CREEK ENERGY STATION
RIESEL, TEXAS**

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December 2018
SCS File No. 16215106.00

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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, 2017 through November 19, 2018.

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 are 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

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 are 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.

2.3 Ash Transport Fugitive Dust Control Measures

Both bottom ash and fly ash are conveyed to either the CCR landfill via open trucks; or fly ash may be sold for beneficial reuse into enclosed tank trucks for transport off-site. This subsection of the Plan encompasses this operation from placing these types of ash into the trucks through the material arriving at the CCR landfill or leaving the Facility. Dust control measures used for this portion of the Facility's operation include the following:

Conveyance into Trucks for Disposal at the Facility

- Bottom ash is placed into the trucks while still wet so that dust control will not be an issue;
- Fly ash from the silo falls from a chute into the transfer trucks to lower the fall distance;
- Fly ash from the silo is conditioned with water in the pug mill prior to dropping it into the transfer truck;
- All open 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 10 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.

Conveyance into Enclosed Tank Trucks to be Hauled Off-Site

- Where fly ash is to be sold, it is dropped dry through a telescoping chute from the silo (does not go through the pug mill) into an enclosed tank truck;
- Excess fly ash is re-entrained by an outer chute and transported back into the silo.
- To minimize accumulation within the chute, the operator terminates the ash drop cycle and allows the excess ash to be re-entrained into the other chute and sent back to the silo; and
- For any small amounts of ash that accumulate around the seal of the tank truck, this is managed through the use of a gantry on-site that the driver of the tank truck can use to sweep off the top of the truck.

- In mid 2019, a fly ash wash pad will be installed that will allow drivers to wash down the tanks prior to leaving the site.

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 as discussed in Section 5;
- 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 in accordance with New Source Review Permit 70861, Condition 25); and
- The nature of the fly ash is such that when moistened a harder top layer develops which is utilized as necessary to decrease dust generation due to wind erosion.
- A protective cover layer of soil or bottom ash over fly ash is also used on the CRR landfill to minimize wind erosion.

3.0 SUMMARY OF CITIZEN COMPLAINTS

There was one citizen complaint relating to CCR dust events at the site during this reporting period. The information regarding the complaint and the corrective action taken is as follows:

- Date and time of complaint: October 2, 2018 – 8 A.M.;
- Date and time of alleged CCR fugitive dust-related issue being noted: October 1-2, 2018 (general time);
- Description of the alleged event: Dust emissions were observed from market loaded trucks travelling on Farm-to-Market Road 1860;
- Copies of any pertinent documents provided by the TCEQ or EPA: No formal complaint was submitted to TCEQ or EPA; and
- Name of Facility person logging the complaint: Darryl Sparks.

4.0 CORRECTIVE ACTIONS TAKEN

The following corrective measures regarding CCR fugitive dust were taken during the reporting period:

- Regarding the citizen's complaint mentioned above, it was noted that the fly ash was accumulating on top of the trucks due to issues with the loading chute not allowing all excess ash to be re-entrained into the ash silo. To prevent this, a gantry was installed and brooms were provided to sweep off the accumulated dust from the truck tops prior to leaving the site. Also, the dust accumulated at the gantry area is cleaned up at the end of each work day with a front end loader and transported to the landfill;

- The facility installed a pipe and valve to pump the ash into the baghouse vent from overloaded trucks (if too much ash is placed into truck causing road weight limits to be exceeded);
- Overloaded trucks with incorrect coupling/fitting to exhaust the ash back into the baghouse are escorted to the landfill where the ash is preconditioned by wetting before unloading into the landfill; and
- In 2019 a fly ash wash pad will be installed that will allow drivers to wash down the tanks prior to leaving the site.