

# Annual CCR Fugitive Dust Control Report

## Cherokee Station

Prepared By: HDR

**December 14, 2018**

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## 1.0 Introduction

This Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report (Annual Report) has been prepared pursuant to the air criteria of 40 Code of Federal Regulations (CFR) Part 257.80(c). The Annual Report summarizes activities described in the CCR Fugitive Dust Control Plan (Plan) for Cherokee Station and includes the following components:

- Description of actions taken to control CCR fugitive dust;
- A record of all citizen complaints; and
- A summary of any corrective measures taken.

This Annual Report addresses the period from October 15, 2017, to October 14, 2018. The Annual Report is deemed complete when it is placed in the facility's operating record as described in Section 6.0 of this report. The deadline for completing the initial Annual Report was December 14, 2017. Subsequent Annual Reports are due one year after the date of completing the previous annual report. This report is due on December 14, 2018.

The Annual Report will be placed in the operating record. The Annual Report will also be placed on the CCR Rule Compliance Data and Information public website described in Section 6.0.

## 2.0 Facility Description and Contact information

### 2.1 Facility General Information:

Cherokee Station was a coal fired electric generating station that underwent a phased transition from coal to natural gas as the fuel source. Coal fired generation at Cherokee ceased in August 2017, and with it the production of fly ash. The storage silo has been emptied of CCR and removed from service, and is no longer a CCR fugitive dust source. The bottom ash impoundments continued to receive non-CCR waste streams through August 2018. Closure of the CCR impoundments by removal of all CCR was initiated in 2018 and is expected to be completed in 2018, at which time there will no longer be CCR units at Cherokee Station. In 2018, CCR sources at Cherokee Station are the removal of bottom ash from the CCR impoundments, transport of the bottom ash from the impoundments for offsite disposal, and fugitive emissions from paved roads.

The facility's Fugitive Dust Control Plan includes activities such as conditioning CCRs for handling, controlling vehicle speeds, watering/sweeping of roads and work areas, and following processes and procedures intended to minimize dust. Because the facility is currently required to manage and monitor fugitive dust emissions as required by the Title V permit, the Cherokee staff and CCR contractor are actively engaged in proactive dust control on a continuous basis. The Plan is a formal statement of the activities and the methods specifically designed to minimize the creation of airborne dust, meeting all of the applicable requirements of the CCR Rule.

Name of Facility: **Cherokee Station**

Street: **6198 Franklin St.**

City: **Denver**

State: **CO**

ZIP Code: **80223**

County: **Denver**

Latitude: **39.808016** Longitude: **-104.967487**

## 2.2 Facility's Contact Information:

Citizens can log fugitive dust complaints via the dedicated email account ([PSCoCCRIquiries@xcelenergy.com](mailto:PSCoCCRIquiries@xcelenergy.com))

## 3.0 Fugitive Dust Controls

The following fugitive dust control measures were implemented during the period of October 15, 2017, to October 14, 2018.

The facility implemented the dust mitigation procedures defined in the Fugitive Dust Control Plan. A copy of the Plan can be found in the facility's operating record and on Xcel Energy's CCR Rule Compliance Data and Information public website.

As described in the Plan, the facility ensured that bottom ash was handled only in a wetted state to minimize fugitive dust generation. Plant roads were regularly watered according to current road conditions and needs. Weather conditions were visually monitored to enable adjustment of watering practices to minimize dust formation.

The following table identifies CCR generation areas, CCR handling operations, and the preferred control measures to reduce dusting. Figure 1 illustrates all of these areas of the facility.

<b>Plant Activity</b>	<b>Fugitive Dust Control Measures</b>	<b>Effectiveness</b>
Plant Roadways	Paved roads, 15 mph limit, watering, and sweeping	Effective
Bottom Ash Impoundments	Slurry sluice with dewatering and large particle size which does not lead to dusting	Effective
Ash Hauling	Water dust suppression, wet sweeping, and transport of conditioned ash	Effective

Figure 1. Cherokee Station Site Map



## 4.0 Citizen Complaints

Citizens can log fugitive dust complaints via the dedicated email account ([PSCoCCRInquiries@xcelenergy.com](mailto:PSCoCCRInquiries@xcelenergy.com)) or via the Plant Environmental Analyst. Any citizen complaints of fugitive dust appearing to originate from the plant were to be investigated immediately. If any complaints are received, they are recorded in a log, including any follow-up or corrective actions that were taken.

### 4.1 Complaints

No citizen complaints were received and, therefore, no entries were made in the log.

### 4.2 Follow-up & Corrective Action and Documentation

No follow-up or corrective actions were necessary.

## 5.0 Plan Assessment & Effectiveness

The overall implementation and effectiveness of the Fugitive Dust Control Plan at the Cherokee Station has been successful. All CCR controls were successfully applied as needed. No alterations were required for the previously identified controls. No new CCR controls were identified. The implemented controls are functioning effectively by controlling fugitive dust emissions.

## 6.0 Recordkeeping, Notification & Internet Requirements

### 6.1 Recordkeeping

This Fugitive Dust Control Plan will continue to be assessed annually unless a need is identified earlier during an inspection or upon analysis of a citizen complaint. The plan will be updated if any new dust control measures are implemented at Cherokee or a new CCR unit is constructed. Any citizen complaints will be logged, and appropriate corrective actions will be documented and implemented according to the Plan. The Cherokee facility map was revised to reflect the cessation of hauling fly ash from the silo.

### 6.2 Internet Site Requirements

The most recent Annual Report will be placed on the facility's CCR website titled "CCR Rule Compliance Data and Information" within 30 days of placing it in the operating record.