Annual CCR Fugitive Dust Control Report

Comanche Station

Prepared By: HDR

December 13, 2021

Contents

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 Comanche 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, 2020, to October 14, 2021. The Annual Report is deemed complete when it is placed in the facility's operating record. The initial Annual Report was completed December 14, 2016. Subsequent Annual Reports are due one year after the date of completing the previous annual report, which last year was completed December 14, 2020. The completion deadline for the current Annual Report is December 14, 2021. The Fugitive Dust Plan was updated on May 18, 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 6.2.

2.0 Facility Description and Contact Information

2.1 Facility General Information:

Comanche Station has one on-site landfill for the disposal of CCR, which is being built in phases. Cell 1 is the original landfill and was filled until interim grade was reached, at which point the cell was placed into temporary closure with intermediate cover and seeded. Ash disposal capacity was expanded with the construction of Cell 2 East (see Figure 1), with initial ash placement in November 2018. The two landfill cells use the same haul road for the majority of their route. When the fill in Cell 2 East reaches the interim grade of Cell 1, additional CCR will be placed in Cell 1. CCR sources are the loading and unloading of silos containing commingled fly ash and Flue Gas Desulfurization (FGD) material, bottom ash from the boilers, transport of fly ash from the silos to the on-site landfill, transport of the bottom ash from the bottom ash treatment system bunkers and temporary storage bunkers to the on-site landfill, emplacement of the fly and bottom ash in the landfill, transport of fly ash and bottom ash offsite for beneficial use, fugitive emissions from paved roads, and fugitive emissions from unpaved roads.

The facility's Fugitive Dust 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 Comanche 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: **Comanche Station**

Street: **2005 Lime Rd.**

City: **Pueblo** State: **CO** ZIP Code: **81006**

County: **Pueblo**

Latitude: **38.20513** Longitude: **-104.578048**

2.2 Facility's Contact Information:

Citizens can log fugitive dust complaints via the dedicated email account (PSCoCCRInquiries@xcelenergy.com)

3.0 Fugitive Dust Controls

The following fugitive dust control measures were implemented during the period of October 15, 2020, to October 14, 2021.

The facility implemented the dust mitigation procedures defined in the Fugitive Dust Control Plan, Revision 1 dated May 18, 2018. 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 fly ash and bottom ash were handled in a manner that minimizes fugitive dust generation. This includes moisture conditioning the CCR during handling and the use of sealed pneumatic trucks when transferring fly ash without conditioning for beneficial use.

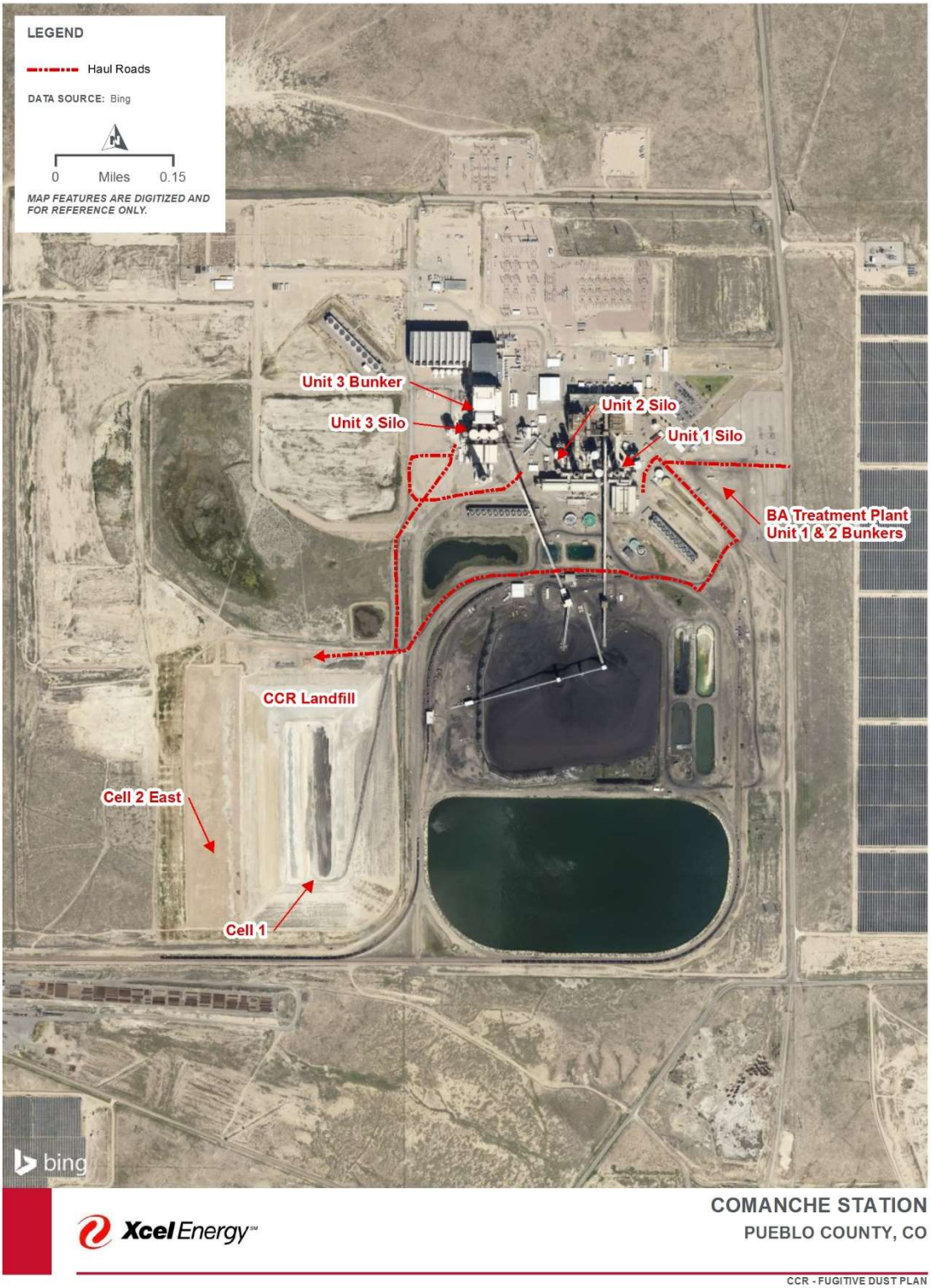
Plant roads were regularly watered according to current road conditions and needs. Chemical road treatment was applied by the CCR contractor on January 7th and July 19th, 2021. Weather conditions were visually monitored to enable adjustment of watering practices to minimize dust formation.

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

Plant Activity	Fugitive Dust Control Measures	Effectiveness
Plant Roadways	Aggregate material, chemical stabilizer, watering, and 10 mph speed limit	Effective
Units 1 and 2 Bottom Ash Treatment System/Bunker	Dewatering and coagulation/flocculation, large particle size which does not lead to dusting	Effective
Unit 3 Submerged Flight Conveyor/Bunker	Submerged-flight conveyor transports conditioned material, and large particle size which does not lead to dusting	Effective
Fly Ash/FGD Silos	Partially enclosed storage, ventilation to baghouse, pug mills condition the fly ash prior to transport, and use of sealed pneumatic trucks when transferring dry fly ash	Effective

Plant Activity	Fugitive Dust Control Measures	Effectiveness
Ash Hauling	Watering and transport of conditioned material	Effective
Landfill	Emplacing conditioned material, compaction via wheeled roller, watered as need to form a crust, and covered by soil. During high wind events (40 mph continuous wind or 55 mph wind gusts) the contractor will reduce or cease landfill operations, if needed.	Effective

Figure 1. Comanche Station Site Map



4.0 Citizen Complaints

Citizens can log fugitive dust complaints via the dedicated email account (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 Comanche 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 Comanche 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 Comanche facility map was updated to include the new Bottom Ash Treatment System and updated traffic patterns (see Figure 1).

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.