

# Annual CCR Fugitive Dust Control Report

## Cherokee Station

Prepared By: HDR

**December 14, 2019**

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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, 2018, to October 14, 2019. 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, 2018. The completion deadline for the current Annual Report is December 14, 2019.

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:

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 and bottom ash. The fly ash storage silos were emptied of CCR and removed from service in 2017, and are no longer CCR fugitive dust sources. Closure of the CCR bottom ash impoundments by removal of all CCR was completed in December 2018, and the former impoundments area is no longer a CCR fugitive dust source. During the reporting period covered by this Annual Report, CCR sources at Cherokee Station were 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, through December 2018, after which there were no longer any CCR sources at the facility. Fugitive dust control measures for non-CCR sources continue to be implemented pursuant to the facility's Title V permit.

The facility implemented the dust mitigation procedures defined in the Fugitive Dust Control Plan, Revision 1.0 dated December 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 bottom ash was handled only in a wetted state to minimize fugitive dust generation. Closure of the bottom ash impoundments was completed in December 2018. 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 ([PSCoCCRIquiries@xcelenergy.com](mailto:PSCoCCRIquiries@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

Due to the closure of the bottom ash impoundments in December 2018, this will be the final Annual CCR Fugitive Dust Control Report for Cherokee Station. The Plan and reports will remain in the Operating Record for at least five years pursuant to the recordkeeping requirements in 257.105(b).

The Cherokee facility map presented in Figure 1 of this document was revised to reflect the cessation of hauling fly ash from the silo, and closure of the bottom ash impoundments.

### 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.