

Annual CCR Fugitive Dust Control Report

Comanche Station

Prepared By: HDR

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Contents

1.0 Introduction	1
2.0 Facility Description and Contact Information	1
2.1 Facility General Information:	1
2.2 Facility's Contact Information:	2
3.0 Fugitive Dust Controls	2
4.0 Citizen Complaints	4
4.1 Complaints	4
4.2 Follow-up & Corrective Action and Documentation	4
5.0 Plan Assessment & Effectiveness	4
6.0 Recordkeeping, Notification & Internet Requirements	4
6.1 Recordkeeping	4
6.2 Internet Site Requirements	4

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, 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:

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 CCR from the silos to the landfill or offsite, transport of the bottom ash from the temporary storage bunkers to the landfill, emplacement of the fly and bottom ash in the landfill, 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 (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.

The CCR landfill was expanded with construction of Cell 2 East (see Figure 1) for additional ash disposal capacity. The haul road has been extended to access Cell 2 East.

As described in the Plan, the facility ensured that fly ash and bottom ash were 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.

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 Pond/Bunker	Slurry sluice with dewatering and 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, and pug mills condition the fly ash prior to transport	Effective
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	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 required no updates.

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.