

Annual CCR Fugitive Dust Control Report

Valmont 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 Valmont 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, 2017. Subsequent Annual Reports are due one year after the date of completing the previous annual report, which 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:

Valmont Station was a coal fired electric generating station that ceased operating in 2017 and with it the production of fly ash and bottom ash also ceased. The fly ash storage silo was emptied of CCR and removed from service in 2017, and is no longer a CCR fugitive dust source. The bottom ash impoundments ceased receiving non-CCR waste streams in 2018, and were closed by removal of all CCR in October 2018. Historically, bottom ash removed from the impoundments was disposed at the on-site CCR landfill. The landfill has been temporarily closed with an interim vegetated soil cap. The landfill is expected to receive additional approved non-CCR waste (coal fines) in 2020 from clean-up of the former coal pile area, after which the landfill will undergo final closure in 2021 with installation of a CCR compliant cap. During transport to and emplacement of coal fines from the former coal pile area to the CCR landfill, the active landfill will be a potential CCR source, and non-CCR sources will include fugitive emissions from the former coal pile area and paved roads and unpaved roads.

The facility's Fugitive Dust Control Plan includes activities such as controlling vehicle speeds, watering of roads and work areas, observing changes in meteorological conditions, and following processes and procedures intended to minimize dust. 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: **Valmont Station**

Street: **1800 63rd St.**

City: **Boulder**

State: **CO**

ZIP Code: **80301**

County: **Boulder**

Latitude: **40.018889** Longitude: **-105.200833**

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, 2018, through October 31, 2019, after which there were no longer any active 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, and fugitive dust emissions continue to be assessed at the landfill during the weekly CCR inspections.

The facility implemented the dust mitigation procedures defined in the Fugitive Dust Control Plan, Revision 2 dated January 8, 2019. 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 exposed CCR 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 | Watering and 15mph speed limit | Effective |
| Landfill | Temporarily closed with vegetated soil cap; weekly CCR inspections continue. In 2020 non-CCR waste will be transported by trucks, compacted via wheeled roller watered as needed to control dusting, and the final cover installed. During active landfill operations, if high wind events (40 mph continuous wind or 55 mph wind gusts) occur the contractor will reduce or cease landfill operations, as needed. | Effective |

Figure 1. Valmont Station Site Map



4.0 Citizen Complaints

Citizens can log fugitive dust complaints via the dedicated email account (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 Valmont 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 Valmont or 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 Valmont facility map was revised to reflect the 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.