ANNUAL FUGITIVE DUST CONTROL REPORT **HUGO PLANT** WESTERN FARMERS ELECTRIC COOPERATIVE



COAL COMBUSTION RESIDUAL COMPLIANCE

REPORTING PERIOD **CALENDER YEAR 2018**

Prepared By: Cardinal Engineering, LLC

CA#7110 Exp 6/20/2020

3700 West Robinson Avenue, Suite 200 Norman, OK 73072 (405) 701-5058

CEL 181410





1. Introduction

The "CCR Fugitive Dust Control Plan" was written and certified by Burns and McDonnell in October 2015. This report is intended to fulfill the requirements for an Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report (Annual Report) established in 252:517-13-1(c). The Annual Report summarizes the activities as described in the Coal Combustion Residual Fugitive Dust Control Plan (CCR Dust Plan) and includes a description of actions taken to control CCR fugitive dust, a record of all citizen complaints, and summary of any corrective actions.

2. Actions Taken to Control CCR Fugitive Dust

Haul Roads

Haul roads are utilized to remove CCR from the plant for beneficial use. The roads at the plant are both asphalt paved and unpaved. Water trucks are used to control fugitive dust on the unpaved haul roads.

CCR Landfill

Fly ash is pneumatically transported from the electrostatic precipitators and temporarily stored in silos near the fly ash landfill. Most of the ash is loaded directly into trucks from the silo for transport off site for beneficial use. The remaining ash is loaded into trucks and placed in the CCR landfill.

Economizer ash is pneumatically transported to a silo located adjacent to the plant. From that silo it is loaded into an enclosed truck, moved to the fly ash landfill via the haul roads and placed in the CCR landfill.

Water trucks are utilized to control emissions from handing the CCR in the landfill.

CCR Impoundment

Some bottom ash is removed from the impoundment for beneficial use. The potential to produce fugitive dust is negligible. Water is utilized to limit dusting from any bottom ash removed for beneficial use if dusting becomes a problem.

3. Citizen Complaint(s) During the Compliance Period

There were no citizen complaints logged during the compliance period.

4. Corrective Action(s) During the Compliance Period

Since there were no citizen complaints made to WFEC regarding fugitive dust emissions, no corrective action(s) were necessary during the compliance period.

5. Plan Assessment

As a part of the Annual Report preparation process the effectiveness of the CCR Fugitive Dust Control Plan was assessed and no modifications or additions were determined to be necessary.