wfec western farmers electric cooperative

PO Box 429 Anadarko, OK 73005 (405) 247-3351 www.wfec.com

January 8, 2024

Ms. Hillary Young, P.E.
Chief Engineer
Land Protection Division
Oklahoma Department of Environmental Quality
707 N. Robinson
P.O. Box 1677
Oklahoma City, OK 73162

Re: 2023 Fugitive Dust Control Report and Annual Inspection by a Professional Engineer
Coal Combustion and Residuals (CCR) Landfill
Western Farmers Electric Cooperative (WFEC) - Hugo Power Station, Fort Towson, Oklahoma
Solid Waste Permit No. 3152008

Dear Ms. Young:

Enclosed, please find a copy of the 2023 Annual Fugitive Dust Control Report and the 2023 Annual Inspection Report for the Coal Combustion Residual (CCR) landfill (CCR Unit 1) at Western Farmers Electric Cooperative's (WFEC's) Hugo Facility (Facility). The 2023 Annual Fugitive Dust Control Report is prepared to meet the requirements as outlined in Oklahoma Administrative Code (OAC) 252:517-13-1(c). The 2023 Annual Inspection Report is prepared to meet the requirements as outlined in OAC 252:517-13-5(b)(2).

A copy of this report will be placed in the facility's operating record and on the facility's publicly accessible internet website. Please notify me at 405-247-4298 or at k_fletcher@wfec.com if you have any questions.

Sincerely,

Kent Fletcher

Kent Fletcher
Environmental Coordinator

cc: John McCreight / Western Farmers Electric Cooperative
Chris Schaefer and Bert Smith / Altamira-US, LLC

2023 Annual Fugitive Dust Control Report

WESTERN FARMERS ELECTRIC COOPERATIVE
HUGO POWER STATION
Fort Towson, Oklahoma

January 8, 2024

Prepared for:

Western Farmers Electric Cooperative

P.O. Box 429

Anadarko, Oklahoma 73005

Prepared by:

Altamira-US, LLC

525 Central Park Drive, Suite 500

Oklahoma City, Oklahoma 73105

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ALTAMIRA

Table of Contents

1.0 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 40 CFR Part 257.80(c) and OAC 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. The Annual CCR Fugitive Dust Control inspection was performed on November 8th, 2023 by Christopher Schaefer.

2.0 ACTIONS TO CONTROL CCR FUGITIVE DUST

2.1 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.

2.2 CCR LANDFILL

Fly ash is pneumatically transported from the electrostatic precipitators and temporarily stored in silos near the CCR 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 CCR landfill via the haul roads and placed in the CCR landfill.

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

2.3 CLOSURE OF CCR IMPOUNDMENT

Bottom ash was previously managed in the Surface Impoundment CCR Unit. Wet sluicing of bottom ash from the boiler to the former surface impoundment unit was replaced with a dry bottom ash system that uses a conveyer to remove bottom ash from the boiler to a storage bunker. As such, the Surface Impoundment CCR Unit was no longer necessary.

Closure activities for the Surface Impoundment CCR Unit, which had previously been implemented, were continued from the previous year into early 2023. Closure activities in early 2023 involved removing bottom ash from the CCR Impoundment, transporting it to the CCR landfill via an unpaved road designated for bottom ash transport, and placement of the bottom ash into the CCR Landfill. Fugitive dust was negligible during closure due to the saturated condition of the ash. Water was utilized as necessary to limit dusting from the bottom ash and from the road.

The Oklahoma Department of Environmental Quality (ODEQ) approved certification of CCR removal on May 16, 2023 and final closure of the last remaining cell of the Surface Impoundment CCR Unit (CCR3) was approved by the ODEQ on August 22, 2023.

3.0 CITIZEN COMPLAINT(S) DURING THE COMPLIANCE PERIOD

There were no citizen complaints logged during the compliance period.

4.0 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.

5.0 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.