

COAL COMBUSTION RESIDUALS ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Colorado Springs Utilities' Clear Spring Ranch
Coal Combustion Residuals Landfill
El Paso County

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1.0 INTRODUCTION

The Environmental Protection Agency (EPA) has established national regulations within Title 40 of the Code of Federal Regulations [40 CFR Parts 257 and 261] that provide a comprehensive set of requirements for the disposal of Coal Combustion Residuals (CCR), commonly known as coal ash, from coal-fired power plants. These regulations, often referred to as the CCR Rule, contain provisions that are applicable to Colorado Springs Utilities' Clear Spring Ranch CCR Landfill located in El Paso County.

The purpose of this report is to satisfy the requirements of § 257.80 (c), which states that the owner or operator of a CCR unit must prepare an Annual CCR Fugitive Dust Control Report (Annual Report) that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken.

2.0 REPORTING PERIOD

The reporting period for this Annual Report is October 20, 2019 through October 19, 2020. The next Annual Report shall be prepared for the reporting period of October 20, 2020 through October 19, 2021. The deadline for completing the next Annual Report is December 2021, which is one year after the date of completing the previous report; as required under § 257.80(c).

3.0 ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

Colorado Springs Utilities adhered to the CCR Fugitive Dust Control Plan dated December 19, 2016 during the entire reporting period. The fugitive dust control measures implemented during the reporting period primarily consisted of the following:

3.1 Conditioned CCR

The mechanical CCR conditioning systems in place at both the Drake and Nixon Power Plants were utilized; therefore, CCR was loaded into trucks as conditioned CCR prior to transport to the CCR Landfill.

3.2 Daily Checks

Daily checks of the on-site haul roads, unloading areas, final placement activities, and overall CCR Landfill were conducted by the Plan Coordinator, or their designee(s), to monitor whether fugitive dust was being generated and to ensure conditioned CCR was being emplaced. Actions required to control a fugitive dust problem identified by the daily observations were recorded in a written or electronic facility log.

3.3 Truck Covering

Trucks transporting CCR were covered to reduce the potential for emissions of fugitive dust and spillage while in transit to the CCR Landfill.

3.4 Unpaved Roads - Watering

Unpaved roadways on-site were watered to control fugitive emissions, as necessary.

3.5 Reduced Vehicle Speed

Vehicle speeds on unpaved roadways on-site were limited to a maximum of 15 miles per hour via appropriate signage. The speed limit was enforced by the Plan Coordinator, or their designee(s), as necessary.

3.6 Deposit of Dirt and Mud on Improved Streets

CCR spillage on roads was cleaned up in a timely manner, if necessary.

3.7 Material Unloading / Final Placement / Cover / Re-vegetation

When at the CCR Landfill, trucks were unloaded slowly and at the lowest height possible. Water spray was used if material unloading and/or final placement activities were resulting in significant fugitive dust emissions; and also used to provide further "CCR conditioning", if needed. Water spray as required, or 6 inches of soil cover was used daily to prevent fugitive emissions from CCR landfill areas that had not yet had final cover applied.

4.0 EFFECTIVENESS ASSESSMENT

Colorado Springs Utilities must periodically assess the effectiveness of the CCR Fugitive Dust Control Plan [257.80(b)(4)]. An effectiveness assessment was performed by the Plan Coordinator in conjunction with the preparation of this Annual Report using the procedures described in Section 7.0 of the CCR Fugitive Dust Control Plan, or similar approach.

The Plan Coordinator considered the existing CCR Fugitive Dust Control Plan dated December 19, 2016 to be effective and that no modification / alterations to the plan appeared required.

5.0 CITIZEN COMPLAINTS AND CORRECTIVE MEASURES

The process by which Colorado Springs Utilities would receive and respond to citizen complaints related to fugitive dust events at the CCR landfill is defined in Section 5.0 of the CCR Fugitive Dust Control Plan.

No citizen complaints were received during the reporting period, and as such no corrective measures were required.