

# Coal Combustion Residuals Fugitive Dust Control Plan

Colorado Springs Utilities' Martin Drake Power  
Plant

Legacy Coal Combustion Residuals (CCR)  
Surface Impoundments and CCR Management  
Units Final Rule

*El Paso County*  
March 6, 2026



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# 1 Introduction

The former Martin Drake Power Plant (Drake) facility is owned by the City of Colorado Springs on behalf of its enterprise Colorado Springs Utilities (Utilities) and is located at 700 Conejos Street, Colorado Springs, CO 80903. The former Drake facility was a coal-fired plant that managed coal combustion residuals (CCR). The Drake facility ceased operation of coal-burning units in August 2021 and is now operating as an electrical power generation facility fueled by six modular dual-fuel capable (diesel or natural gas) generators.

The Environmental Protection Agency (EPA) has established national regulations within Title 40 of the Code of Federal Regulations [40 CFR Parts § 257 & 261] governing the disposal of CCR from coal-fired power plants. CCR means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers [40 CFR Part § 257.53].

The CCR Rule requires owners or operators of CCR units to adopt measures that effectively minimize CCR from becoming airborne, including fugitive dust from CCR units, roads, and other CCR management and material handling activities [40 CFR § Part 257.80(a)].

Although Drake no longer conducts coal-burning operations, a CCR unit remains (Historic Ash Basins Area). Therefore, this plan applies to activities that may disturb, expose, or otherwise interact with onsite CCR (e.g., inspection, maintenance, construction/earthwork, closure/post-closure care, investigation/remediation, transport, or beneficial use handling) and focuses controls on those activities and adjacent traffic routes as required by 40 CFR § 257.80.

## 2 Purpose of this Plan

The general purpose of this CCR Fugitive Dust Control Plan (the Plan) is to aid in ensuring that Utilities' operations at the Drake facility are performed in accordance with the applicable air criteria provisions of the CCR Rule, specifically those within 40 CFR Part § 257.80 (a) through (d).

CCR fugitive dust means solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney [40 CFR Part § 257.53].

Utilities adopts measures that effectively minimize CCR from becoming airborne at the Drake facility, including CCR fugitive dust originating from the roads and other on-site CCR management and material handling activities [40 CFR Part § 257.80(a)]. The measures are presented in this Plan.

## 3 Plan Coordinator & Material Handling Personnel

Utilities shall operate the Drake facility in accordance with this Plan [40 CFR Part § 257.80(b)].

**Plan Coordinator:** The Power Plants Materials Handling Operations Supervisor is designated as the Plan Coordinator and is responsible for ensuring that the measures outlined in this Plan are implemented. The Plan Coordinator may delegate responsibilities, as deemed appropriate, to achieve the Plan's objectives and requirements.

**Drake Personnel:** Because routine coal and ash operations have ceased, *personnel involved in CCR-related activities* includes employees and contractors who may inspect, maintain, disturb, handle, load, transport, place, excavate, cap/cover, or otherwise interact with the CCR unit during closure, post-closure, maintenance, construction, or remedial activities.

**Awareness & Training:** The Plan Coordinator shall ensure that such personnel are aware of the Plan, know where it is located, and understand its requirements, including any amendments [40 CFR § 257.80(b)(1), (b)(6)].

**Stop-Work & Notification.** If personnel observe significant CCR fugitive dust being generated by any CCR-related activity, they must promptly notify the Plan Coordinator (if available) and pause the activity until suitable dust controls are implemented and the issue is resolved. Work may resume once effective measures are in place.

## 4 CCR Fugitive Dust Control Measures

Given the cessation of coal-burning and the resulting reduction in CCR-disturbing activities, dust control measures are typically implemented as-needed for roads and work areas near CCR units (collectively “CCR management units,” or CCRMUs).

Primary CCR fugitive dust sources at or near CCRMUs are:

- 1) Surfaces of CCRMUs
- 2) Access Roads Near CCRMUs and
- 3) Maintenance, Construction, or Closure Activities That Disturb CCR

The primary CCR fugitive dust causes are:

- 1) Wind Erosion and
- 2) Mechanical Disturbance and
- 3) Vehicle Traffic on Roads Adjacent to CCRMUs.

The Plan Coordinator (or designee) will select measures appropriate to field conditions and may combine them for effectiveness.

**Roadway controls:** Establish/enforce reduced speed limits; maintain road surfaces (paving where feasible), routine wetting or dust suppressants, and mechanical sweeping of paved segments; manage traffic routing to minimize tracking through CCR areas; install track-out controls at egress points.

**Activity-based controls:** Pre-wet/condition CCR prior to handling; use water spray/fog during disturbance; reduce drop heights; stage work to limit open/exposed CCR areas; apply cover systems (temporary tarps, foam, soil cover, or vegetative stabilization) after activity; utilize wind barriers or wind fencing where practical; halt or reduce operations during high-wind events.

**Area stabilization:** Prompt surface crusting via wetting or suppressants; temporary or permanent cover/vegetation in inactive areas to prevent erosion; restrict access to non-work areas.

**Equipment & handling:** Cover/tarp loads containing CCR; maintain adequate moisture conditioning of CCR; inspect for leaks/spills and immediately clean up; ensure equipment is appropriately maintained to avoid unnecessary re-entrainment.

Other CCR fugitive dust control measures may be used, if applicable and appropriate for site conditions. If other measures are routinely or periodically used, or conversely, if a current measure is no longer considered effective, this plan should be amended (see Section 8.0).

## 5 Citizen Complaints

Utilities must log citizen complaints received involving CCR fugitive dust events at the Drake facility [40 CFR § 257.80(b)(3)]. The Plan Coordinator, or their designee, shall use the following procedure, or similar approach:

- Periodically communicate with the Communications Section and Customer Services Department to establish a reasonable level of assurance that a citizen complaint pertaining to fugitive dust at the Drake facility and received through Colorado Springs Utilities' primary telephone, mail, email, and/or social media platforms would be routed to the Plan Coordinator.
- Gather relevant information from the citizen to understand the circumstances, facts, weather conditions, and timing surrounding the event.
- Inform the appropriate Drake Personnel (material handling personnel), who shall investigate the event in a timely manner to evaluate if CCR fugitive dust is being generated, and if so, enact control measures to effectively minimize CCR from becoming airborne.
- Complete the log provided in Attachment A, or similar log, to document the details provided by the citizen, on-site circumstances surrounding the event, and any corrective measures taken.
- Any citizen complaints logged shall be included as part of the Annual CCR Fugitive Dust Control Report (see Section 6.0).

## 6 Annual CCR Fugitive Dust Control Report

Utilities must prepare an Annual CCR Fugitive Dust Control Report (Annual Report) that includes: (i) actions taken to control CCR fugitive dust, (ii) a record of all citizen complaints, and (iii) a summary of any corrective measures taken [40 CFR § 257.80(c)].

The Plan Coordinator, or their designee, is responsible for preparing the Annual Report. The Environmental Services Section - Technical Services Unit shall provide guidance and support, if requested.

- The initial Annual Report must be completed no later than 14 months after placing the initial Plan in the facility's operating record; subsequent reports are due annually thereafter. For this section, the report is "completed" when placed in the facilities operating record.
- The reporting periods shall be defined in each Annual Report.



## 7 Effectiveness Assessment

Utilities must periodically assess the effectiveness of this Plan [40 CFR § 257.80(b)(4)]. An assessment may be appropriate after a significant unanticipated CCR fugitive dust event, or in conjunction with the Annual Report (see Section 6.0). The Plan Coordinator, or their designee, shall use the following procedure, or similar approach:

- Review all actions taken to control CCR fugitive dust, citizen complaints, and corrective measures taken since the prior assessment. Evaluate if there are any obvious deficiencies or consistent / reoccurring patterns with regard to dust events that would merit operational changes.
- Review general effectiveness of all control measures listed within Section 4.0. Evaluate if any of the control measures are ineffective or outdated and would merit operational changes.
- Review the general site conditions and typical CCR management practices. Evaluate if any significant changes have occurred that would merit operational changes.
- Determine if the plan is effective or requires amendments. If amendments appear merited, contact the Environmental Services Section - Technical Services Unit for assistance.

## 8 Plan Amendments & Certification

Utilities may amend this Plan at any time, provided the revised Plan is placed in the facility's operating record (see Sections 9.0, 10.0, & 11.0). Utilities must amend the Plan whenever a change in conditions would substantially affect it [40 CFR § 257.80(b)(6)]. The Plan Coordinator, or their designee, is responsible for initiating such amendments with the Environmental Services Section - Technical Services Unit, who shall provide guidance and support.

### 8.1 Amendment History

Version	Date	Description of Primary Modifications / Updates
Initial	March 2026	Initial CCR Fugitive Dust Control Plan

## 8.2 Certification of Plan

Utilities must obtain a certification from a Qualified Professional Engineer that the initial Plan, or any subsequent amendment, meets the requirements of 40 CFR § Part 257.80.

"I hereby certify that this Plan meets the requirements of the Coal Combustion Residual Rule (40 CFR § 257.80(b)(7))."



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Matthew Rohr  
Colorado PE License: 0053467  
License Renewal Date: 31OCT2027  
Signed 06MAR2026

## 9 Recordkeeping Requirements

Utilities must place the following information, as it becomes available, in the facility's operating record [40 CFR § 257.80(d)]:

- The Plan and any subsequent amendments of the Plan. Each fugitive dust control plan must be maintained for five years after closure by removal in accordance with § 257.102(c)(1) or (2) or completes post-closure care in accordance with § 257.014(e) or (g) is completed at the last CCR unit at the facility [40 CFR § 257.105(g)(1)].
- The Annual CCR Fugitive Dust Control Report. Each fugitive dust control report must be maintained for five years after closure by removal in accordance with § 257.102(c)(1) or (2) or post-closure care in accordance with § 257.104(e) or (g) is completed at the last CCR unit at the facility [40 CFR § 257.105(g)(2)].

The Plan Coordinator, or their designee, shall be responsible for ensuring that these records are maintained in facility's operating record.

## 10 Notification Requirements

Utilities must notify the State Director (i.e., Colorado Department of Public Health and Environment) when the following are placed in the operating record [40 CFR § 257.80(d)]:

- The CCR Fugitive Dust Control Plan and any subsequent amendment of the Plan [40 CFR § 257.106(g)(1)].
- The Annual CCR Fugitive Dust Control Report [40 CFR § 257.106(g)(2)].

The Environmental Services Section - Technical Services Unit shall be responsible for ensuring these required notifications are made to the State Director.

# 11 Publicly Accessible Internet Site Requirements

Utilities must place the following information on the CCR website [40 CFR § 257.80(d)]:

- The CCR Fugitive Dust Control Plan and any subsequent amendments. Only the most recent plan must be maintained on the CCR website [40 CFR § 257.107(g)(1)].
- The Annual CCR Fugitive Dust Control Report [40 CFR § 257.107(g)(2)].

The Environmental Services Section - Technical Services Unit shall be responsible for ensuring these website postings are made.



## Appendix A. Citizen Complaint Log

# FUGITIVE DUST CITIZEN COMPLAINT FORM

**GUIDANCE:** The purpose of this form is to document citizen complaints of Coal Combustion Residual (CCR) fugitive dust events, circumstances of the event, and any facility corrective action. Please provide as much detail as possible in the fields below. This form is to be completed by the Plan Coordinator, or their designee, with any additional documentation or relevant information to be appended to this form. A copy of this completed form should be included as part of the Annual CCR Fugitive Dust Control Report.

## Section 1: Information Provided by Citizen

_____ Name of Citizen (if provided)	_____ Citizen Contact Information (if provided)
_____ Date and time of fugitive dust event	_____ Date and time of complaint (if different)
_____ Event ongoing or complete?	_____ Observation point
Description of event (location, duration, color, meteorological conditions, etc.): _____	
_____ Additional comments: _____	
_____	

## Section 2: Information Provided by Colorado Springs Utilities' Representative

_____ Name of Representative	_____ Title of Representative
_____ Date and time of investigation	_____ Was CCR fugitive dust observed?
Additional comments: _____	
_____	

### **If CCR fugitive dust is observed, complete the items below:**

Description of event (location, duration, color, meteorological conditions, etc.): \_\_\_\_\_

\_\_\_\_\_  
Description of root cause: \_\_\_\_\_

\_\_\_\_\_  
Description of corrective action(s) implemented: \_\_\_\_\_

\_\_\_\_\_  
Describe the effectiveness of any corrective action(s) implemented: \_\_\_\_\_

\_\_\_\_\_