

2017 ANNUAL FUGITIVE DUST CONTROL PLAN REPORT

CITY UTILITIES OF SPRINGFIELD, MISSOURI

PREPARATION DATE: 12/11/2017

PREPARED BY: Gerad Fox, PE

TABLE OF CONTENTS

Annual Report Certification Page 1

Description of Actions Taken to Control CCR Fugitive Dust..... Page 2

Record of Citizen Complaints Page 3

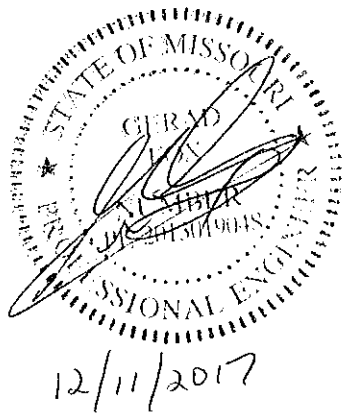
Summary of Any Corrective Actions Taken Page 3

PLAN CERTIFICATION

Gerard Fox, Missouri Professional Engineer, License Number 2013019048, hereby certifies that the CCR fugitive dust control plan annual report set forth herein meets the requirements of 40 CFR Section 257.80(c).

Name: Gerard Fox
Signature: [Handwritten Signature]
Date: 12/11/2017

Affix Seal Here



CUS 2017 CCR Annual Fugitive Dust Control Plan Report

Per 40 CFR Part 257.80(c) City Utilities of Springfield (CUS) is required to prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner and operator to control CCR fugitive dust. The report below will serve as CUS annual CCR fugitive dust control report and includes:

1. Description of Actions Taken to Control CCR Fugitive Dust
2. CCR Fugitive Dust Incidents Reported to the Missouri Department of Natural Resources (MDNR)
3. Record of Citizen Complaints
4. Summary of Any Corrective Actions Taken

Description of Actions Taken to Control CCR Fugitive Dust

CUS has taken the following actions in order to minimize fugitive dust from our CCR handling and transport at the John Twitty Energy Center (JTEC).

- The use of CCR conditioning equipment to moisten all CCR being transported to the on-site permitted CCR landfill.
- Performed preventative and required maintenance on all CCR conditioning equipment as per manufacturer recommendations.
- Maintained contracts with the original equipment manufacturer (OEM) of all CCR conditioning equipment.
- JTEC Unit 1 bottom ash process procedures include dewatering in order to achieve an appropriate conditioned consistency, absent of free liquids, prior to transport to the on-site CCR landfill.
- Haul road watering and sweeping as necessary and as a condition of the air quality Title V Operating Permit (i.e., OP2015-055) issued by the MDNR.
- Watering CCR active vehicular areas within the landfill.
- Limiting/Minimizing CCR transport, placement, and other landfill activities during high winds where effective watering cannot be achieved. Preparations in advance of pending changes in weather patterns have proven successful.
- Reducing vehicle speeds as necessary during transport.
- Housekeeping activities to maintain clean loading areas.
- Washing transport vehicle as necessary.
- Traveling on designated haul roads.
- Accepting only conditioned CCR in the landfill. Any exceptions to this will be recorded and noted in the Summary of Corrective Actions Taken section of this report.
- Emplacing and compacting CCR in its permanent resting place as soon as practicable.
- Placing the required clay and top soil to close out the utilized sections of the landfill. Followed by seeding these capped portions of the landfill to establish vegetation.
- Ensure adequate vegetation is maintained on all capped portions of the landfill as part of weekly inspection and corrective actions taken.
- Prevent landfill track out via the use of track out rock pad, replaced/repared as needed.

CUS 2017 CCR Annual Fugitive Dust Control Plan Report

- Met quarterly with maintenance and management personal to discuss CCR handling issues and procedures
- Performed weekly and annual CCR unit inspections per 40 CFR Part 257.

CUS has taken the following actions in order to minimize fugitive dust from our CCR handling and transport at the James River Power Station (JRPS).

- JRPS stopped burning coal as of October 2015, therefore CCR is no longer generated at this facility.
- CUS has closed by removal all surface impoundments at this facility as of June 20, 2017. All CCR from the surface impoundments was emplaced and compacted in the active JRPS CCR landfill. Final certification of the verification report was completed and placed in the operating record in August 2017.
- CUS is in the process of temporarily closing the JRPS CCR landfill. Clay and top soil have been placed and the area has been seeded
- Haul road watering as necessary.
- Reduce vehicle speeds as necessary during transport.
- Washing transport vehicle as necessary.
- Emplacing and compacting CCR in permanent resting place as soon as practicable.
- Prevent landfill track out via the use of track out rock pad, replaced/repared as needed.
- Met quarterly with maintenance and management personnel to discuss CCR handling issues and procedures
- Performed weekly and annual CCR unit inspections per 40 CFR Part 257.

Record of Citizen Complaints

CUS received a citizen complaint from the City of Springfield Yard Waste Recycling Center via Erick Roberts on November 27, 2017 at 8:53 AM regarding fugitive dust blowing on to their property which sits east of the JTEC CCR landfill. The complainant mentioned the fugitive dust had been occurring “over the last few windy/dry days” however the exact dates and times were not given.

Summary of Any Corrective Actions Taken

CUS noted an incident/event on January 10, 2017 of fugitive dust leaving the property due to high winds at the JRPS facility. The fugitive dust originated from the old coal storage area that had just been cleaned and backfilled, but vegetation had yet to be established. No activity was occurring at the location during the event. Mobile sprinklers were set up and a water truck was deployed periodically throughout the day in attempt to mitigate the fugitive dust from occurring. After the corrective actions was taken no further fugitive dust was noted on the days following the incident. This event was reported to MDNR via email on January 10, 2017.

CUS 2017 CCR Annual Fugitive Dust Control Plan Report

CUS noted an incident/event on January 10, 2017 of fugitive dust leaving the property due to high winds at the JTEC facility. The fugitive dust originated from the JTEC CCR landfill and JTEC coal pile. No activity was occurring at the location during the event. Water trucks were deployed periodically throughout the day on the JTEC landfill and continuous water sprays were deployed on the JTEC coal pile in attempt to mitigate the fugitive dust from occurring. After the corrective actions were taken no further fugitive dust was noted on the days following the incident. This event was reported to MDNR via email on January 10, 2017.

Contractors began to haul conditioned CCR from the JTEC facility to the JRPS CCR landfill using covered trucks in November 2016. On June 12, 2017, CUS was notified of an incident where a transport truck hauling CCR between JTEC and JRPS had overturned and spilled onto the road and into the right-of-way. CUS responded immediately by deploying a vacuum truck and excavating equipment to clean the spill. The CCR collected from the spill was then transported to the JRPS CCR landfill. This event was reported to MDNR via email on June 14, 2017.

As noted in the complaint section above, CUS received a citizen complaint from City of Springfield Yard Waste Recycling Center via Erick Roberts on November 27, 2017. Fugitive dust from the JTEC CCR landfill crossed the property line and blew onto the yard waste recycling facility. Upon receiving the complaint, CUS immediately deployed a water truck to water the landfill and mitigate the fugitive dust from occurring and leaving the property boundary. CUS management staff reached out to the City on the same day of the complaint to notify them of the corrective action(s) taken. After the corrective actions were taken no further fugitive dust was noted on the days following the incident. This event was reported to MDNR via email on December 11, 2017.