

2018-ANNUAL FUGITIVE DUST CONTROL PLAN REPORT

CITY UTILITIES OF SPRINGFIELD, MISSOURI

PREPARATION DATE: 12/11/2018

PREPARED BY: Gerad Fox, PE

TABLE OF CONTENTS

Annual Report Certification Page 1

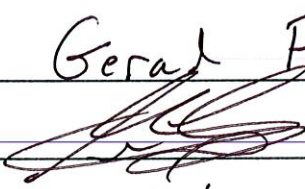
Description of Actions Taken to Control CCR Fugitive Dust..... Page 2

Record of Citizen Complaints Page 3

Summary of Any Corrective Actions Taken Page 3

PLAN CERTIFICATION

Gerad 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: Gerad Fox
Signature: 
Date: 12/11/2018

Affix Seal Here



12/11/18

CUS 2018 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 2018 CCR Annual Fugitive Dust Control Plan Report

- 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.

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 has completed the process of temporarily closing the JRPS CCR landfill. Clay and top soil have been placed and vegetation has been established.
- 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

No citizen complaints were received by CUS since the 2017 Annual Fugitive Dust Control Plan Report.

Summary of Any Corrective Actions Taken

CUS noted an incident/event involving the JTEC Unit 1 fly ash transport line on February 16th, 2018. The fly ash transport line had a connection failure on the vertical run leading up to the Unit 1 fly ash silo. Approximately 5-10 tons of ash leaked onto the ground. Upon discovery of the connection failure the Unit 1 fly ash transport system was isolated, the connection was repaired by CUS maintenance personnel and the JTEC Unit 1 fly ash transport system was then returned to service.

CUS noted an incident/event on May 14th, 2018 of fugitive dust leaving the property due to high winds at the JTEC facility. The fugitive dust originated from the JTEC CCR landfill. No activity was occurring at the location during the event. Water trucks were deployed periodically throughout the day on the JTEC landfill 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 May 14th, 2018.

CUS noted an incident/event involving the JTEC Unit 2 fly ash silo filter separator on August 27th, 2018. The fly ash silo filter separator mechanical exhauster began to emit small quantities of fly ash indicating a broken bag in the system. Upon discovery of the incident the Unit 2 fly ash transport system was isolated, the broken bags were replaced by CUS maintenance personnel and the JTEC Unit 2 fly ash transport system

CUS 2018 CCR Annual Fugitive Dust Control Plan Report

was then returned to service. CUS personnel performed an EPA Method 9 – Visual Emission Observation to ensure fly ash was no longer being emitted after the repairs were completed. Due to this incident CUS personnel initiated the 8 weekly and 4 bi-weekly EPA Method 22 – Visual Emission Observations schedule as required by the MDNR Title V operating permit (OP2015-055).

CUS noted an incident/event involving the JTEC Unit 2 fly ash silo filter separator on November 9th, 2018. The fly ash silo filter separator mechanical exhaust began to emit small quantities of fly ash indicating a broken bag in the system. Upon discovery of the incident the JTEC Unit 2 fly ash transport system was isolated, the broken bags were replaced by CUS maintenance personnel and the Unit 2 fly ash transport system was then returned to service. CUS personnel performed an EPA Method 9 – Visual Emission Observation both during the actual time the fly ash was being emitted and after the bag change out had occurred to ensure fly ash was no longer being emitted. CUS personnel also restarted 8 weekly and 4 bi-weekly EPA Method 22 – Visual Emission Observations schedule as required by the MDNR Title V operating permit (OP2015-055). As this issue had occurred earlier in the year it was decided that all filter bags within the Unit 2 filter receiver should be replaced in the near future. On November 28th, 2018 all filter bags within the JTEC Unit 2 fly ash silo filter separator were replaced.