

2016 ANNUAL FUGITIVE DUST CONTROL PLAN REPORT

CITY UTILITIES OF SPRINGFIELD, MISSOURI

PREPARATION DATE: 12/14/2016

PREPARED BY: Gerad Fox, PE

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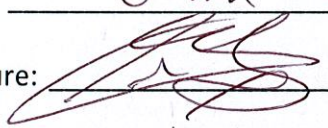
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PLAN CERTIFICATION

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: 12/14/2016

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CUS 2016 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 plan 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 condition all CCR being transported to the on-site CCR landfill.
- Performed preventative and required maintenance on all CCR conditioning equipment.
- Maintained contracts with the original equipment manufacturer (OEM) of all CCR conditioning equipment.
- Had the OEM on-site in April and May of 2016 to inspect the operation of the CCR conditioning equipment.
- Completed clean closure of inactive CCR surface impoundments as of October 2016.
- JTEC Unit 1 bottom ash is dewatered 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 issued by the MDNR.
- Watering CCR vehicular activity areas within the landfill.
- Limiting CCR transport and landfill activities during high winds where effective watering cannot be achieved.
- 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.
- Emplacing and compacting CCR in its permanent resting place as soon as practicable.
- Prevent landfill track out via the use of track out rock pad, replaced as needed.
- Met quarterly with maintenance and management personal to discuss CCR handling issues and procedures
- Performed weekly CCR unit inspections

CUS 2016 CCR Annual Fugitive Dust Control Plan Report

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. However, CUS still operates and maintains an active CCR landfill.
- All remaining CCR that was contained in our storage silos was completely removed by December 2, 2016.
- Currently CUS is clean closing all surface impoundments at this facility and is emplacing and compacting the CCR in the active CCR landfill. This process involves reclaiming all CCR from the surface impoundments and hauling via transports trucks.
- The ash being reclaimed from the surface impoundments is considered conditioned due the high moisture content.
- Haul road watering as necessary.
- Reducing 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 as needed.
- Meet quarterly with maintenance and management personnel to discuss CCR handling issues and procedures
- Performed weekly CCR unit inspections

Record of Citizen Complaints

No citizen complaints were received in 2016.

Summary of Any Corrective Actions Taken

CUS noted an incident/event on the February 19, 2016 weekly CCR inspection of fugitive dust leaving the property due to high winds and contractor activity that was occurring at the JRPS CCR landfill. Activity was stopped until a water truck was used to minimize fugitive dust. Soil cement was applied on February 22, 2016 to further address the issue. This event will be reported to MDNR as part of the Annual Compliance Certification (ACC) Statement due before April 1, 2017.

CUS noted an incident/event on the March 22, 2016 weekly CCR inspection of fugitive dust leaving the property to high winds in excess of 30 miles per hour at the JRPS CCR landfill. No activity was occurring at the landfill. As noted above soil cement was already applied to the landfill to try and prevent fugitive dust caused by wind. All vehicle traffic was halted until conditioned improved. This event will be reported to MDNR as part of the Annual Compliance Certification (ACC) Statement due before April 1, 2017.

CUS 2016 CCR Annual Fugitive Dust Control Plan Report

Contractors began to haul conditioned CCR as from the JTEC facility to the JRPS CCR landfill using covered trucks in November 2016. CUS observed the hauling activities to ensure no fugitive dust was escaping the covered trucks. On December 2nd fugitive dust was observed leaving the truck as it was transporting conditioned CCR due to a ripped cover. CUS requested the transport truck no longer be used by the contractor.