

Date: December 7, 2017

To: Operating Record

From: Kathryn M. Cunningham, P.E.

RE: Annual CCR Fugitive Dust Control Report
J.H. Campbell Generating Complex

Introduction

This report serves as the Annual CCR Fugitive Dust Control Report required by the United States Environmental Protection Agency (EPA), Coal Combustion Residual (CCR) Resource Conservation and Recovery Act (RCRA) Rule. It describes the measures implemented at Consumers Energy's Bottom Ash Ponds (Units 1&2 north and south and Unit 3 north and south), Pond A, and the Licensed Dry Ash Landfill at the J.H. Campbell Generating Complex (JHC) for minimizing fugitive dust emissions from coal combustion residuals (CCR). The JHC facility is located at 17000 Croswell St. in West Olive Michigan and is a coal fired electric generating power plant with three boiler units. Specifically, this report has been developed and placed in the facility operating record in accordance with the CCR regulations stipulated in 40 CFR Part 257.80(c), as well as posted to the public website in accordance with 257.107(d). This report is required to include a description of the actions taken by plant personnel or contractors to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective actions taken.

Fugitive Dust Control Activities

The dry fly ash handling system (transfer tanks, pneumatic piping, and landfill/sale silos) and corresponding particulate matter controls are properly maintained and inspected daily. Proper moisture conditioning is maintained through the pin-paddle mixers prior to loading the ash into transport trucks for placement in the licensed landfill. Vacuum fans are operated during truck loading to capture and transfer any fugitive dust back up into the silo which is controlled by a bin vent filter. A water truck is available for further conditioning during spreading and compacting at the landfill cell as necessary. Straw matting has been placed on inactive portions of the open landfill as warranted. The surrounding roadways are well maintained and watered as needed and the 25 mph speed limit is observed. Primary roadways within the Ash Handling area were also treated with a dust suppressant to further minimize fugitive dust.

The Bottom Ash Storage ponds are actively accepting sluiced CCR material until the new bottom ash tanks are operational in 2018. Any excavating and/or transfer activities, as well as the storage piles are visually monitored for potential dusting. Activities are to be suspended in the event excessive dusting (leaving the site boundaries) is occurring or when there are sustained wind speeds of over 20 mph. The bottom ash settling ponds remain in a wet and/or vegetative condition that minimizes fugitive dust generation.

Citizen Complaints

There were no citizen complaints of CCR fugitive dust received at the JHC facility for the time period December 15, 2016 to December 7, 2017.

Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a daily basis and corrective as well as preventative measures are properly implemented as warranted. There were no specific corrective actions warranted since the initial posting of the Fugitive Dust Control Plan.

Conclusion

An assessment of the Fugitive Dust Control Plan was conducted on October 25, 2017. Applicable aspects of the plan were found to be correctly implemented with no findings to report. During the site visit, the FDCP was reviewed and found to reflect current operations.