

A CMS Energy Company

Date: December 15, 2016

To: Operating Record

From: Kathryn M. Cunningham, P.E.

RE: Annual Fugitive Dust Control Report for Coal Combustion Residuals
J.R. Whiting Generating Plant

Introduction

This report is the first 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 actions taken at Consumers Energy's J.R. Whiting (JRW) facility ash ponds 1&2 and 6 to minimize fugitive dust from CCR units. The JRW facility is located at 4525 Erie Road, Erie, Michigan and was a coal fired electric generating power plant that ceased operation in April of 2016. Specifically, this report has been developed and placed into the facility operating record in accordance with the CCR regulations stipulated in 40 CFR Part 257.80 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 J.R. Whiting plant ceased electric generation activities on April 12, 2016; with decommissioning activities starting in April as well.

The dry fly ash handling system discontinued operation after full shut down of the boiler unit ID fans and electrostatic precipitators. The dry ash handling systems (piping and silo) were cleaned out and ash was disposed of properly. Up until that time, proper maintenance and daily monitoring of the flyash handling systems was executed to minimize fugitive dust. Remnant ash from cleaning the silo and piping was disposed of in the ash ponds.

The ash storage ponds are no longer routinely accepting CCR material; however excavating activities are a part of the pond closure and are visually monitored for dusting. Activities are suspended if there is excessive dusting or when there are sustained wind speeds of over 20 mph. Seed, mulch, and fertilizer have been placed on the final cover for Pond 6, and hay or straw has been placed and crimped on exposed areas for the winter.

Pond 1&2 remains in a wet and/or vegetative condition that minimizes fugitive dust generation. Surrounding roadways are well maintained and rarely traveled (for daily inspections) and the 15 mph speed limit is observed.

A third party contractor was hired to maintain the roadways as needed to minimize the potential for generation of fugitive dust. Two water trucks were observed to be active on site during the annual assessment.

Citizen Complaints

There were no citizen complaints of fugitive dust received at the JRW facility for the time period October 16, 2015 to December 15, 2016.

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 17, 2016.

Applicable aspects of the plan were found to be correctly implemented with no findings to report. During the site visit, the FDCP was amended to reflect decommissioning operations vs. power generation. The amended plan has been signed by a professional engineer and posted to the operating record as required.