

A CMS Energy Company

Date: December 1, 2017

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 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 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 CCR units are located adjacent to the former JRW facility, located at 4525 Erie Road, Erie, Michigan; the facility 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 company 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. The former electric generation plant was divested on October 19, 2017 and is no longer owned by Consumers Energy. The CCR regulation is now only applicable to Ash Ponds 1&2 and corresponding roadways as final cover has been placed on Pond 6 and has an established vegetative cover.

Ash Ponds 1&2 remain in a wet and/or vegetative condition that minimizes fugitive dust generation. Closure activities for these units will commence in the spring of 2018. Construction activities are suspended if there is excessive dusting or when there are sustained wind speeds of over 20 mph. Surrounding roadways are well maintained and rarely traveled (for routine inspections) and the 15 mph speed limit is observed.

### **Citizen Complaints**

On May 17, 2017 a citizen complaint was logged regarding potential dusting from Pond 6 area. Visible emissions were logged by the fugitive dust plan coordinator and the on-site contractor watered the suspect areas. On June 19, 2017 a citizen complaint regarding dusting from Pond 6 area was logged. No construction activities were taking place at the time of the call. High winds were recorded that day, prior to a pending rainstorm. The subsequent rain event that day alleviated any issues, and no further action was warranted.

**Corrective Actions**

All potential CCR fugitive dust areas are monitored visually according to the Fugitive Dust Plan and corrective as well as preventative measures are properly implemented as warranted.

**Conclusion**

An assessment of the Fugitive Dust Control Plan was conducted on September 11, 2017. 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 current decommissioning and pond closure activities. The amended plan has been signed by a professional engineer and posted to the operating record as required.