



Annual CCR Fugitive Dust Control Report

East Kentucky Power Cooperative

Spurlock Station

Reporting Period:

October 6, 2021 – October 5, 2022

INTRODUCTION

East Kentucky Power Cooperative (EKPC) is required to prepare this Annual Coal Combustion Residuals (“CCR”) Fugitive Dust Control report in accordance with 40 CFR §257.80(c). This report covers the period between October 6, 2021 and October 5, 2022. The report includes:

- A description of the actions taken by the owner or operator to control CCR fugitive dust,
- A record of all citizen complaints, and
- A summary of any corrective measures taken.

A list of the fugitive emission sources that have been identified in the Fugitive Dust Control Plan for Spurlock Power Plant, a brief description of the source, and a list of actions taken to control CCR fugitive dust during the reporting period are found in Table 1.

EKPC has established a webform on the CCR Rule Compliance Data and Information website to log citizen complaints. Complaints received are manually logged on a Microsoft Excel worksheet that is used to record all complaints, all resolutions to those complaints, and, if necessary, corrective measures during the reporting period. A copy of the worksheet is included in Table 2. No citizen complaints associated with fugitive dust were received during this reporting period.

Table 1 - Fugitive Emission Sources and Dust Control Measures

Source Name	Source Description	Actions taken to control CCR Fugitive Dust during the reporting period
U1 & U2 Fly Ash Loadout	Loadout operation into truck for transfer to landfill	<p>Adding water as needed.</p> <ul style="list-style-type: none"> • CCR material was watered as needed to control fugitive emissions. • CCR conditioning did not result in free liquids. <p>Using Sweeper Trucks</p> <ul style="list-style-type: none"> • Sweeper trucks were utilized to keep the area clean of deposited CCR material. <p>Using Skirting</p> <ul style="list-style-type: none"> • Skirting was utilized to control fugitive emissions by keeping dust enclosed in the structure during loading. <p>Controlling the flow rate.</p> <ul style="list-style-type: none"> • The flow rate of CCR material was adjusted as needed to control fugitive emissions.
U3 Bed Ash Silo Loadout	Loadout operation into truck for transfer to landfill	<p>Using telescopic chutes</p> <ul style="list-style-type: none"> • The telescopic chutes were utilized to control fugitive emissions by reducing the distance the material travels.

		<p>Using bulk tank trucks</p> <ul style="list-style-type: none"> • A bulk tank truck was utilized to control fugitive emissions by preventing the fugitive dust from escaping during loading and travel. <p>Using Sweeper Trucks</p> <ul style="list-style-type: none"> • Sweeper trucks were utilized to keep the area clean of deposited CCR material.
U3 Fly Ash Silo Loadout	Loadout operation into truck for transfer to landfill	<p>Adding water as needed.</p> <ul style="list-style-type: none"> • CCR material was watered as needed to control fugitive emissions. • CCR conditioning did not result in free liquids. <p>Using Skirting</p> <ul style="list-style-type: none"> • Skirting was utilized to control fugitive emissions by keeping dust enclosed in the structure during loading. <p>Controlling the flow rate.</p> <ul style="list-style-type: none"> • The flow rate of CCR material was adjusted as needed to control fugitive emissions. <p>Using Sweeper Trucks</p> <ul style="list-style-type: none"> • Sweeper trucks were utilized to keep the area clean of deposited CCR material.
U4 Bed Ash Silo Loadout	Loadout operation into truck for transfer to landfill	<p>Using Bulk Tank Trucks</p> <ul style="list-style-type: none"> • A bulk tank truck was utilized to control fugitive emissions by preventing the fugitive dust from escaping during loading and travel. <p>Controlling the flow rate.</p> <ul style="list-style-type: none"> • The flow rate of CCR material was adjusted as needed to control fugitive emissions. <p>Using telescopic chutes</p> <ul style="list-style-type: none"> • The telescopic chutes were utilized to control fugitive emissions by reducing the distance the material travels. <p>Using Sweeper Trucks</p> <ul style="list-style-type: none"> • Sweeper trucks were utilized to keep the area clean of deposited CCR material.
U4 Fly Ash Silo Loadout	Loadout operation into truck for transfer	<p>Adding water as needed.</p> <ul style="list-style-type: none"> • CCR material was watered as needed to control fugitive emissions.

	to landfill	<ul style="list-style-type: none"> • CCR conditioning did not result in free liquids. <p>Using Skirting</p> <ul style="list-style-type: none"> • Skirting was utilized to control fugitive emissions by keeping dust enclosed in the structure during loading. <p>Controlling the flow rate.</p> <ul style="list-style-type: none"> • The flow rate of CCR material was adjusted as needed to control fugitive emissions. <p>Using Sweeper Trucks</p> <ul style="list-style-type: none"> • Sweeper trucks were utilized to keep the area clean of deposited CCR material.
Gypsum Waste	Temporarily stored in pile prior to transportation to the Landfill.	<p>Adding water as needed.</p> <ul style="list-style-type: none"> • CCR material was watered as needed to control fugitive emissions. • CCR conditioning did not result in free liquids. <p>Removal of Waste to Landfill</p> <ul style="list-style-type: none"> • Removal of gypsum waste to the landfill was utilized to control fugitive emissions by preventing dust build up.
Ash Pond	Storage of CCR material	<p>Adding water as needed to the ash pond bridge lift/staging area.</p> <ul style="list-style-type: none"> • CCR material was watered as needed to control fugitive emissions. • Free liquids resulting from wetting is allowed as long as drainage is sent back to the pond. <p>Remove CCR to Landfill</p> <ul style="list-style-type: none"> • All temporary piles of CCR material resulting in fugitive dust were addressed by removing the CCR and hauling it in covered trucks to the landfill.
Landfill	Used for long term storage of CCR waste	<p>Adding water and/or brine as needed.</p> <ul style="list-style-type: none"> • CCR material was watered as needed to control fugitive emissions. • CCR conditioning did not result in free liquids. <p>Landfill Cover System(s)</p> <ul style="list-style-type: none"> • Cover system(s), final and/or temporary, were utilized to control fugitive dust emissions by covering the landfill as needed. • Vegetative cover was established on slopes with final and/or temporary cover systems.

<p>Hauling to Landfill</p>	<p>Roads used to transport CCR waste to landfill</p>	<p>Adding water as needed.</p> <ul style="list-style-type: none"> Roads were watered as needed to control fugitive emissions from CCR material. CCR conditioning did not result in free liquids. <p>Control vehicle speed</p> <ul style="list-style-type: none"> Vehicle speed on the CCR material haul roads was minimized to control fugitive emissions. Speed limit signs are posted. <p>Cover trucks</p> <ul style="list-style-type: none"> Trucks hauling CCR material were tarped during transport. <p>Limit vehicle traffic</p> <ul style="list-style-type: none"> Landfill haul roads are only used by authorized vehicles to reduce unnecessary traffic. <p>Using Sweeper Trucks</p> <ul style="list-style-type: none"> Sweeper trucks were utilized to keep the area clean of deposited CCR material. <p>Truck Tire Wash</p> <ul style="list-style-type: none"> A tire wash is utilized by vehicle traffic to minimize carryover and dust on the haul road to the landfill from the ash pond closure project.
<p>U1/U2 Bottom Ash Silo Load Out</p>	<p>Loadout operation into truck for transfer to landfill</p>	<p>Adding water as needed</p> <ul style="list-style-type: none"> CCR material was watered as needed to control fugitive emissions. CCR conditioning did not result in free liquids. <p>Controlling the flow rate</p> <ul style="list-style-type: none"> The flow rate of CCR material was adjusted as needed to control fugitive emissions.
<p>New U1/U2 Fly Ash Silo Load Out</p>	<p>Loadout operation into truck for transfer to landfill</p>	<p>Adding water as needed</p> <ul style="list-style-type: none"> CCR material was watered as needed to control fugitive emissions. CCR conditioning did not result in free liquids. <p>Controlling the flow rate</p> <ul style="list-style-type: none"> The flow rate of CCR material was adjusted as needed to control fugitive emissions.
<p>Vacuum Truck Ash Handling Station & Load</p>	<p>Vacuum truck unloading and loadout operation</p>	<p>Wind Fences & Foggers</p> <ul style="list-style-type: none"> A wind fence is installed to control fugitive dust when unloading and loading material.

<p>Out</p>	<p>into truck for transfer to landfill</p>	<ul style="list-style-type: none"> • The fogging system is utilized during the material unloading and loading processes. <p>Truck Tire Wash</p> <ul style="list-style-type: none"> • A tire wash is utilized by vehicle traffic to minimize carryover and dust on the haul road to the landfill from the handling station.
<p>Filter Press & Filter Press Truck Load Out</p>	<p>Loadout operation from the waste water treatment plant's filter press</p>	<p>Bay doors</p> <ul style="list-style-type: none"> • Loading bay doors were closed during the filter press discharge to minimize fugitive emissions.

Table 2 - Spurlock Power Plant 2021-2022 Citizen Complaints and Corrective Measures*

East Kentucky Power Cooperative
 CCR Rule Compliance
 Fugitive Dust Citizen Complaint Log



LAST UPDATED: 12-Oct-15

REFERENCE NUMBER	STATION	UNIT/LOCATION	DESCRIPTION	REMEDIAL ACTION REQUIRED	PLANT LEVEL RESPONSIBLE PERSON(S)	DATE OF COMPLAINT	DATE OF INITIATING REMEDY	DATE REMEDY COMPLETED	ACTION CLOSED (Y/N)	WORK ORDER NO.	LOCATION OF FILES ON H: DRIVE

* During the 2021 to 2022 reporting period, there were no citizen complaints and no corrective actions were required.