



A CMS Energy Company

Date: December 1, 2017
To: Operating Record
From: Kathryn M. Cunningham, P.E.
RE: Annual CCR Fugitive Dust Control Report
BC Cobb Generating Plant

Introduction

This report is 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 B.C. Cobb (BCC) Bottom Ash Pond and Ponds 0-8 for minimizing fugitive dust emissions from coal combustion residuals (CCR). The BCC facility is located at 151 Causeway in Muskegon Michigan and was a coal fired electric generating power plant that ceased operation in April of 2016. Ownership of the plant site was transferred from Consumers Energy (CE) on October 19, 2017; however, Consumers Energy retained ownership of the Bottom Ash Pond and Ponds 0-8. This report has been developed and placed in the facility Operating Record in accordance with 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 the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken.

Fugitive Dust Control Activities

The BC Cobb plant ceased electric generation and began decommissioning activities on April 15, 2016. As previously stated, the decommissioned plant site transferred out of CE ownership on October 19, 2017. The only applicable units under the RCRA regulation are the Bottom Ash Pond and Ponds 0-8.

Ponds 0-8 remain 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.

The former bottom ash pond has been graded for stormwater management and properly controlled with crimped straw matting to reduce dusting potential. There are future plans for sale/beneficial re-use of the bottom ash.

An agreement with a third party contractor is in place to implement roadway maintenance as needed to minimize the potential for generation of fugitive dust.

Citizen Complaints

There were no citizen complaints of fugitive dust received at the BC Cobb facility for the time period December 15, 2016 to December 1, 2017; and therefore no corrective actions were warranted in response.

Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a regular basis as warranted in accordance with the Fugitive Dust Control Plan. Corrective / preventative measures are properly implemented if warranted, including limiting vehicle speed and spraying water for fugitive dust control. There were no specific corrective actions required over the course of the last year.

Conclusion

An assessment of the Fugitive Dust Control Plan was conducted on October 12, 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 subsequently amended to reflect the construction activities on site. The amended plan was signed by a professional engineer and posted to the Operating Record as required.