

Date: November 30, 2018

To: B.C. Cobb Ash Pond Operating Record

From: Joy R. Hwang, Environmental Services Department

RE: Annual Coal Combustion Residual (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), CCR Resource Conservation and Recovery Act (RCRA) Rule. It describes the actions taken at Consumers Energy Company's (CE) B.C. Cobb (BCC) Bottom Ash Pond and Ponds 0-8 for minimizing fugitive dust emissions from CCR. The BCC facility is located at 151 N. 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 proper was transferred from CE on October 19, 2017; however, Consumers Energy retained ownership of the Bottom Ash Pond and Ponds 0-8. This annual report has been developed and placed in the facility Operating Record in accordance with 40 CFR 257.80 and 40 CFR 257.105(g), as well as posted to the public website within 30 days in accordance with 40 CFR 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 measures taken.

Fugitive Dust Control Activities

The BC Cobb plant ceased electric generation and began decommissioning activities on or about 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 routine inspections) and the 15 mph speed limit is observed.

If roadway maintenance is needed to minimize the potential for generation of fugitive dust, a third party contractor will be mobilized.

Citizen Complaints

There were no citizen complaints of fugitive dust received at the BC Cobb facility for the time period December 1, 2017, through November 30, 2018; therefore no corrective actions were warranted in response.

Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a regular basis in accordance with the Fugitive Dust Control Plan. Corrective as well as preventative measures are properly implemented as 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 (FDCP) was conducted on November 2, 2018. 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 is subsequently being amended to reflect closure activities pursuant to 40 CFR 257.80(b)6. The amended plan will be signed by a professional engineer as required by 40 CFR 257.80(b)7 and will shortly be posted to the Operating Record as required by 40 CFR 257.105(g).