

A CMS Energy Company

Date: December 15, 2016

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 first Annual CCR Fugitive Dust Control Report required by 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. Specifically, this report has been developed and placed in 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 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.

The dry fly ash handling system discontinued operation when the boiler units were shut down. The dry ash handling systems (piping and silo) were cleaned out and ash was disposed of properly. Until that time, proper maintenance and daily monitoring of the ash handling systems was executed to minimize fugitive dust. Most of the fly ash left in the silo was pneumatically loaded to haul trucks, covered, and then transported off site to the Consumers Energy J.H. Campbell plant for placement in a licensed landfill. The remaining residual ash was wet-removed by vacuum truck and then placed into permitted Pond 8 for dewatering.

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.

Excavating of bottom ash to piles for offsite beneficial reuse was discontinued by the end of 2015. This area was subsequently graded for stormwater management and exposed areas were covered with straw matting as noted below.

A third party contractor was hired to maintain the roadways as needed through wetting agents 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 October 16, 2015 to December 15, 2016; and therefore no corrective actions were warranted in response.

Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a daily basis and corrective / preventative measures are properly implemented if warranted, including limiting vehicle speed and spraying water for fugitive dust control.

Visible emissions were noted during daily rounds on July 17, 2016 near the bottom ash pond area. The winds were exceptionally high that day. On-site personnel called the environmental field contacts who confirmed the appropriateness of wetting agent application. A contractor was called to spray water for fugitive dust suppression but shortly thereafter the winds subsided and it started to rain, negating the need for an immediate corrective response. Subsequent preventative actions were implemented including reshaping the bottom ash pond area, placing straw matting to minimize future fugitive dust, as well as continuing with daily visual monitoring of the area.

Conclusion

An assessment of the Fugitive Dust Control Plan was conducted on November 9, 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 will be signed by a professional engineer and posted to the operating record as required.