

Muskegon Environmental Redevelopment Group, LLC

12601 Plantside Drive
Louisville, KY 40299
(502) 245-1353 (Office)

Date: January 31, 2022

To: B.C. Cobb Ash Pond Operating Record

RE: Annual Coal Combustion Residual (CCR) Fugitive Dust Control Report
Former BC Cobb Generating Plant Bottom Ash Pond and Ash Ponds 0-8

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 B.C. Cobb Bottom Ash Pond and Ponds 0-8 for minimizing fugitive dust emissions from CCR. The B.C. Cobb facility is located at 151N.Causeway in Muskegon, Michigan, and was formerly a coal-fired electric generating power plant that ceased operation in April of 2016. Ownership of the plant site proper was transferred from Consumers Energy (CE) on October 19, 2017; however, CE retained ownership of the Bottom Ash Pond and Ponds 0-8. On April 16, 2020, ownership of the Bottom Ash Pond and Ponds 0-8 transferred to the Muskegon Environmental Redevelopment Group, LLC (MERG). Charah Solutions, Inc. (Charah) is the primary contractor responsible for removing Coal Combustion Residuals (CCR) as part of a site remediation and CCR beneficiation project.

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 of preparation 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 power 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. The Bottom Ash Pond and Ponds 0-8 have been dewatered and are being excavated to site closure grades in accordance with the B.C. Cobb Generating Facility Bottom Ash Pond and Ponds 0-8 Closure Work Plan. Water is primarily being applied using water trucks and broadcast sprinklers to active excavation areas to minimize fugitive dust generation. Dust suppressing chemicals are available for use for difficult conditions or for disturbed area that are temporarily inactive on an as-needed basis. Existing vegetation is being left in place in areas that are not to be disturbed to mitigate fugitive dust generation. Water is also applied to surrounding roadways and are maintained and have equipment operations with a 15 mph maximum speed limit observed. A minimum of two daily site observations for fugitive dust are made by site personnel and recorded in the fugitive dust observation log that is kept as part of the site fugitive dust control plan and are kept as part of the site operating record.

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Citizen Complaints

There were no citizen complaints received by CE or MERG concerning fugitive dust at the BC Cobb Bottom Ash Pond and Ponds 0-8 facility for the time period December 17, 2020, through December 31, 2021; 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 and dust suppressant chemicals for fugitive dust control. There were no specific corrective actions required over the course of the last year.

Conclusion

An updated dust control plan was prepared by MERG for the BC Cobb Bottom Ash Pond and Ponds 0-8 facility on May 13, 2020 wherein site practices and other applicable aspects of site activities were reviewed. No issues were noted as part of the prior fugitive dust control plan review and current plan preparation. A copy of the current Fugitive Dust Control Plan is available on the MERG CCR Compliance website: <https://merg-crrule.com>