



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

2019 Fugitive Dust Control Report
Coal Combustion Residuals Rule

Escalante Generating Station
Prewitt, New Mexico

Tri-State Generation and Transmission Association, Inc.
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1.0 Introduction

This Coal Combustion Residual (CCR) annual Fugitive Dust Control Plan report (the Report) is developed for the Escalante Generating Station (the Facility) and Ash Disposal Site (the Site) to meet the requirements of the CCR Operating Criteria.

This Report includes descriptions of measures taken at the Site and Facility to manage CCR-related fugitive dust; discussing citizen complaints received during the year; and summarizing the Site and Facility's corrective measures taken to remedy those complaints. This Report also details requirements for recordkeeping and notification of this Report.

2.0 Facility Description

The Facility is a 273-megawatt coal-fired electric generation facility located near Prewitt, New Mexico. CCR generated at the Facility are fly ash, bottom ash and flue gas desulfurization (FGD) material, which are disposed of onsite at the Site that is owned and operated by Tri-State.

3.0 Fugitive Dust Control Measures

The Facility controlled potential CCR fugitive dust emissions from transfer and transportation operations during the year in the following ways:

- Baghouses were operated in accordance with the Title V Operating Permit
- Pneumatic conveyance for dry CCR handling
- Filtered vents for Fly Ash Silos
- Telescoping chutes during ash loading
- Conditioned CCR during collection and loading
- Loaded fly ash sold for off-site beneficial reuse into enclosed trucks or rail cars
- Used a partially enclosed conveyor to transport unsold fly ash, bottom ash and FGD to the CCR handling area.
- Limited fall distance from the front-end loader bucket to haul trucks

Transportation of CCR managed potential CCR fugitive dust during the year in the following manner:

- Covered Haul Truck beds during transportation
- Enforced speed limits for haul trucks
- Maintained road surfaces including sweeping and watering
- Watered haul roads with water or dust suppressant

The Site controlled potential CCR fugitive dust emissions from the placement in the following ways:

- Reduced or halted CCR handling operations during high winds
- Comingled fly ash, bottom ash and FGD during placement
- Limited fall distance at the Site
- Added moisture to CCR during and after placement
- Compacted CCR after placement
- Applied dust suppressant if moisture conditioning are not sufficient
- Applied soil cover and vegetation

Additional, practical measures taken by Escalante Station that minimized the potential for CCR fugitive dust during the year included:

- Routine visible emissions observations during all three phases of CCR handling to ensure effectiveness of control measures
- Weather conditions are monitored each day of Facility operations. If high winds existed, extra measures were taken to ensure minimization of CCR

4.0 Record of Citizen Complaints

No citizen complaints were received during the previous year.

5.0 Summary of Corrective Measures

No citizen complaints were received during the previous year; therefore, no additional measures were taken to correct citizen complaints above the stated Fugitive Dust Control Measures.

6.0 Reporting

The New Mexico Environment Department will also be notified before the close of business of the day the annual report is placed in the Operating Record. Within 30 days of placement in the Operating Record, the annual report will be posted on Tri-State's publicly accessible website.

7.0 Summary

The fugitive dust control measures selected for controlling CCR fugitive dust at the Site and Facility, as described in this report, represent recognized and generally accepted good engineering practice, are applicable and appropriate for site conditions, and are expected to

effectively limit the amount of CCR that becomes airborne at the Site and Facility. Inquiries about this annual report may be directed to:

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