



**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**

2024 Fugitive Dust Control Report  
Coal Combustion Residuals Rule

Escalante Generating Station  
Prewitt, New Mexico

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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 included 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. The Facility stopped generating power on August 31, 2020 and was officially "decommissioned" on November 19, 2020. A new maintenance project was initiated in November 2023 to reconfigure the slope of the landfill on the east side of the Site. Terraces were installed in 2024 on the east slope of the landfill as well as an access road so that slope lengths are shorter to reduce runoff velocities and minimize slope erosion. In addition, six inches of desert rock were installed on the surface to armor the slopes against wind and water erosion while still allowing for revegetation. All CCR material removed as a result of cuts to the slope is managed in the Site.

## 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:

- Conditioned CCR during collection and loading as needed
- 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:

- Enforced speed limits for haul trucks
- 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
- Limited fall distance at the Site

- Road watering was conducted during construction activities when CCR material was being moved (relocated within the Active Landfill) to minimize transport of CCR material.
- Compacted CCR after placement
- Applied soil cover and initiated revegetation

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
- Dust control fencing is in place in strategic areas to control dust coming off the top and along the south side of the Site.
- During and after construction of the new terraces, six inches of cover material was placed on the plateau of the Site to minimize the potential transport of CCR materials during higher wind conditions.
- During east slope reconstruction, cover material was reapplied – 30 inches on Active Landfill plus a six-inch thick layer of rock (desert armor) – to minimize the potential for transport of sediment dust where recent construction of new terraces was completed.
- Pond sediment fines (including *de minimus* CCR from bottom ash system wastewater) were removed from the Continuous Water Supply Ponds to minimize the potential transport of dust during high winds.
- Pond sediment fines (including *de minimus* CCR from scrubber wastewater) were removed from Evaporation Pond 1A to minimize the potential transport of dust during high winds.

#### **4.0 Record of Citizen Complaints**

Two citizen complaints were received during 2024 for observations of dust. Both complaints were filed by the same resident located approximately one mile east of the Facility. The complaints were received approximately April 1, 2024, and May 15, 2024. The resident reported that, during very windy days, “A heavy amount of dust, ash, and possibly metal shavings were blowing off the ‘large dirt mound’” and into her neighborhood. The ‘large dirt mound’ refers to the CCR landfill located on the north side of the Escalante facility property.

#### **5.0 Summary of Corrective Measures**

The Escalante Generating Station was closed and decommissioned in the fall of 2020. There were no cutting or grinding activities occurring at the facility in 2024 that could be potential sources of metal shavings. Therefore, any windblown metal shavings could not have originated from the Escalante Generating Station.

Construction activities conducted at the facility during 2024 included recontouring work on the east and north sides of the landfill. Separately, a third party (Origis Energy) leased property around the facility and constructed a solar power generating site with approximately 500,000 panels located on the east, north, and west sides of the facility. Contractors for both projects (landfill recontouring and solar field) conducted dust suppression activities (watering) during construction activities and suspended construction during high winds to keep dust as minimal as possible. Both projects were completed by mid-summer in 2024.

The landfill recontouring activities were completed and the slopes re-covered on May 21, 2024 (including a layer of rock on the eastern slope designed to minimize sediment transport and erosion due to wind and water). During construction, every effort was made to minimize dust mobilization including (but not limited to) haul road watering and ceasing operations on very windy days. Exposed surfaces were covered as soon as possible to minimize the time of exposure of any CCR material, and berms were constructed around the crown of the landfill to reduce the amount of dust blowing from the top surface of the landfill. In addition, a six-inch layer of cover material was applied to the top of the active plateau of the landfill to minimize the likelihood of any CCR material becoming airborne during high winds.

As an added precaution, the Continuous Water Supply Ponds and Evaporation Pond 1A (located near the west side of the facility) were cleaned out to remove any accumulated fine sediment and residual CCR from wastewaters managed in the ponds. These ponds were dry due to the cessation of generating activities in 2020, and removal of these solids eliminated the possibility of mobilization of fine particles from these ponds during very windy days.

## **6.0 Reporting**

Within 30 days of placement in the Operating Record, the annual report will be posted on Tri-State's publicly accessible website. The New Mexico Environment Department will also be notified within 30 days from the date that the annual report is posted on Tri-State's publicly accessible website according to 40CFR 257.106(d).

## **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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