

April 16, 2019  
File No. 27218357.00

Mr. Brian Trower  
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Ames Municipal Electric System  
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Ames, Iowa 50010

Subject: 2018 Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

Dear Mr. Trower:

SCS Engineers has prepared the 2018 Annual CCR Fugitive Dust Control Report for the City of Ames Steam Electric Plant in accordance with the requirements set forth in §257.80(c) of the CCR Rule (40 CFR 257.50-107).

If you have any questions regarding this document, please contact the undersigned.

Sincerely,



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# Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report



City of Ames Steam Electric Plant

Ames Municipal Electric System  
502 Carroll Avenue  
Ames, Iowa 50010

**SCS ENGINEERS**

Report No. 27218357.00 | April 2019

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# 1 INTRODUCTION

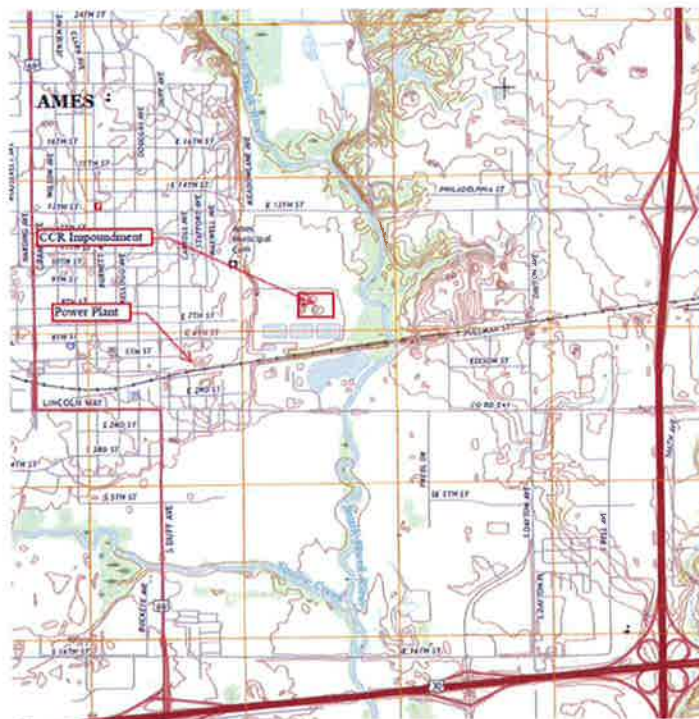
On April 17, 2015, the Environmental Protection Agency issued the final version of the federal Coal Combustion Residuals (CCR) Rule to regulate the disposal of CCR materials generated from the combustion of coal at electric utilities and independent power producers. The initial federal CCR Rule allowed for inactive CCR surface impoundments that had completely closed by April 17, 2018 to have no other requirements applied to that unit (i.e., the “early closure” provisions). However, on June 14, 2016 the United States Court of Appeals for the D.C. Circuit ordered the vacatur of these “early closure” provisions in Code of Federal Regulations (CFR) 40 Part §257.100. The effect of the vacatur is that all inactive CCR surface impoundments must now comply with all of the requirements applicable to existing CCR surface impoundments. Inactive power plant ash impoundments containing CCR are regulated under 40 CFR Part §257.100.

The City of Ames (COA) Ames Municipal Electric System operates a Steam Electric Plant (SEP) located at 200 E 5<sup>th</sup> Street in Ames, Iowa. Associated with the SEP is an Inactive CCR Surface Impoundment (Impoundment). The COA SEP Impoundment is subject to the CCR Rule and in accordance with the rule must complete an Annual CCR Fugitive Dust Control Report as specified in Section §257.80(c) of the rule. This document addresses the annual report for 2018.

This report describes the actions taken to minimize fugitive CCR dust from the CCR unit at this facility, provides a record of citizen complaints received since the previous report, and summarizes any corrective actions taken to minimize CCR fugitive dust.

# 2 BRIEF DESCRIPTION OF IMPOUNDMENT

The COA SEP is located at 200 East 5th Street, in Ames, Iowa. Since 1982 the COA SEP has placed their CCR materials in a single CCR surface impoundment located approximately 3,000 feet northeast of the generating station in Section 1, Township 83 North, Range 24 West, as shown in Figure 1. The approximately 9.6 acre Inactive CCR Surface Impoundment (Impoundment) is located adjacent to and to the east of the COA Water Treatment Plant's Lime Pond. The Impoundment (shown in Figure 2) is approximately 900 feet in length in the east-west direction and a maximum of 675 feet in length in the north-south direction. Based on the 2017 aerial image obtained from the COA and the parcel information found on the COA Beacon™ geographic information system (GIS) site, the area to the north and immediate northeast of the Impoundment is privately-owned crop



land, to the northeast beyond the privately owned crop land is the COA South River Valley Park, to the east (ranging from 450 to 950 feet) is the South Skunk River, to the south is COA property and the railroad embankment for the Union Pacific Railroad, and to the west is the lime pond.



Figure 2 Site Photograph (Google earth, 7/12/2017)

### **3 DESCRIPTION OF THE ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST**

In accordance with the CCR Fugitive Dust Control Plan developed for this facility, the following measures are appropriate options to be used when needed to minimize CCR from becoming airborne:

- Establishing and enforcing a vehicle speed limit. Reduced speeds minimize fugitive dust generated from vehicle traffic.
- Utilizing an outside contractor or COA sweepers to apply water to the gravel perimeter road.
- Application of water to material stockpiles.

- Covering all open-bodied vehicles that are transporting CCR to minimize the generation of fugitive dust during transport of CCR.
- Minimizing fall distances when handling or transferring CCR. Best practices suggest handling CCR material with end loaders or excavators to minimize the fall distance when moving CCR material either onto stockpiles within the Impoundment above the water line or into haul vehicles. Other best management practices can also be used to minimize the generation of fugitive dust.
- Promptly collecting CCR that is observed in vehicle loading/unloading areas to minimize the potential for CCR to become airborne.
- Continued wet-slucing of non-CCR bottom ash and unburned RDF material to the existing Impoundment. Moistened material is less likely to become airborne.

Based on discussion with COA Ames Municipal Electric System staff and visual observation on site December 20, 2018 with winds out of the north/northwest at 18 miles per hour (mph) and wind gusts up to 30 mph, there have been no reported events when fugitive dust control was required since the development of the initial CCR Fugitive Dust Control Plan by Wenck, October 2015.

#### **4 RECORD OF CITIZEN COMPLAINTS**

Citizen complaints pertaining to fugitive dust are managed in accordance with the plan set forth in the CCR Fugitive Dust Control Plan (Revised April 2019). There were no citizen complaints at this facility related to CCR fugitive dust during this reporting period.

#### **5 SUMMARY OF CORRECTIVE MEASURES TAKEN**

Corrective actions in response to citizen complaints were not required during this reporting period.

#### **6 PERIODIC REVIEW OF CCR FUGITIVE DUST CONTROL PLAN**

The CCR Fugitive Dust Control Plan is reviewed annually, and updated as necessary, in conjunction with preparation of the Annual CCR Fugitive Dust Control Report. During the periodic review, COA Ames Municipal Electric System staff evaluate each measure for controlling fugitive dust to ensure that it is still appropriate for minimizing CCR from becoming airborne at the facility and evaluate other operational changes at the facility to determine whether additional dust control measures should be added. The CCR Fugitive Dust Control Plan was revised in April 2019.

#### **7 REVISIONS, RECORDKEEPING, AND REPORTING**

The Annual CCR Fugitive Dust Control Report is required to be prepared on an annual basis. The deadline for completing subsequent reports after the initial report is one year after the date of completing the previous report. For purposes of §257.80(c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by §257.105(g)(2).

COA Ames Municipal Electric System staff will place this Annual CCR Fugitive Dust Control Report in the CCR Operating Record and on the COA's CCR Rule Compliance Data and Information website. The COA Ames Municipal Electrical System staff will notify the Iowa Department of Natural Resources (IDNR) that this report has been completed and placed in the facility's operating record and on the COA CCR Rule Compliance Data and Information website.