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Annual CCR Fugitive Dust Control Report

Rodemacher Unit 2

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1. Introduction

Per 257.80, the owner or operator of Coal Combustion Residual (CCR) units must take action to control fugitive dust from all sites handling and disposing of CCR. The owner or operator must prepare an annual CCR fugitive dust control report that includes 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.

This document will serve as the Annual CCR Fugitive Dust Report for Cleco's Rodemacher Unit 2 located in Rapides Parish, Louisiana. This report will not provide in depth descriptions of all the sources of fugitive dust from Rodemacher Unit 2. This information can be found in the CCR Fugitive Dust Plan.

2. Actions Taken to Control Fugitive Dust

2.1 Fly ash Handling

Fly ash was pneumatically transported from both the precipitator and the fabric filter (baghouse) and stored temporarily in a fly ash silo or byproducts silo. The ASTM C-618 quality Class C fly ash from the precipitator was loaded dry from the fly ash silo into enclosed trucks and transported offsite for beneficial use. Prior to April 2021, fly ash from the fabric filter was sent from the byproducts silo to the pug mill where it was conditioned, loaded into haul trucks and transported to the fly ash impoundment for disposal. Fly ash that was stored onsite prior to beneficial use was transported to the fly ash pond and was further conditioned by water trucks to control fugitive dust emissions. Dust control measures are described in Table 2-1. Hauling of fly ash to the onsite impoundment ceased in April 2021. Fly ash generated from April 2021 to April 2023 was loaded into enclosed trucks and transported to an offsite landfill. After April 2023, fly ash generated was loaded into enclosed trucks and transported to Cell 4 of the onsite landfill. Cell 4 is a CCR compliant cell constructed as part of the onsite ash management area landfill.

Table 2-1: Fly Ash Handling Control Measures

Control/Activity	Description/Action Taken
General Silo Controls	The storage silo is equipped with a bin vent filter. The bin vent filter was operational while loading fly ash.
Dry Loading for Reuse	The dry loading process includes a telescopic chute that lowers into tanker trucks to minimize material fall distance. The loading chute has over-suction to prevent fugitive dust emissions during loading. The telescopic chute was utilized during loading and only enclosed trucks were used.
Impoundment Disposal	Prior to April 2021, fly ash that was not suitable for reuse was conditioned by mixing water with the ash in a pug mill and was transported and unloaded into the CCR impoundment. Some Fly ash suitable for reuse was stored in the impoundment prior to reuse. This Fly ash was loaded dry as noted above and transported to the impoundment in an enclosed tanker type truck. The trucks transporting the ash were equipped with dust curtains and watering systems at the unloading point to wet the ash as it was placed within impoundment to prevent fugitive dust emissions.
Landfill Disposal	After April 2023, fly ash that was not suitable for reuse was conditioned by mixing water with the ash in a pug mill and was transported and unloaded into the CCR landfill cell.

2.2 Haul Roads

The plant has a haul road connecting the plant to the CCR impoundment/landfill site. Haul trucks utilized the haul road to transport CCR materials to the impoundment. Dust control measures are described in Table 2.2.

Table 2-2 Haul Road Dust Control Measures	
Control/Activity	Description/Action Taken
Haul Roads	Haul roads to the CCR impoundments/landfill were treated with water for fugitive dust control. Haul roads also have low speed limit signs posted to lower potential for fugitive dust emissions.
Haul Trucks	All haul trucks that were used to transport dry fly ash were tanker type and are enclosed. Other trucks hauling to the CCR impoundments/landfill carried conditioned ash with moisture content suitable for minimizing fugitive dust emissions.

2.3 CCR Impoundments and CCR Landfill Cell

Bottom and Economizer ash is sluiced to a CCR impoundment. Fly ash was hauled to a Separate CCR impoundment prior to ceasing placement and commencing of transporting of fly ash offsite in April 2021. After April 2023, fly ash was hauled to an onsite CCR landfill cell. Dust control measures are described in Table 2.3.

Table 2-3: CCR Impoundment Control Measures

Control/Activity	Description/Action Taken
Wet Sluicing – Bottom/Economizer Ash	CCR material was sluiced in a wet condition and placed in the impoundment. There were no fugitive dust emissions issues near the bottom ash impoundment. Water trucks were used to further wet any ash that may have posed an issue especially during high wind events.
Placing Unconditioned Fly Ash	Unconditioned fly ash was hauled to the landfill in an enclosed tanker type haul truck. The trucks were equipped with dust curtains and a watering system at the unloading point to condition the material during unloading. Water trucks were used to further wet any ash that may have posed an issue especially during high wind events.
Placing Conditioned Fly Ash	Conditioned ash was mixed with water in the pug mill at the byproduct silo and placed in the landfill. Water trucks were used to further wet any ash that may have posed an issue especially during high wind events.

3. Citizen Complaints

There were no citizen complaints received during the reporting period.

4. Corrective Measures Taken

All dust control measures were effective. No corrective measures were necessary.