

Coal Combustions Residuals

2023 Annual Fugitive Dust Control Report

Prepared for
Montana-Dakota Utilities Company
Lewis & Clark Station

January 2024

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1.0 Introduction

The process of coal combustion residual (CCR) management and CCR disposal at Lewis & Clark Station (Lewis & Clark) of Montana-Dakota Utilities Co. (MDU) is subject to Federal Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments per 40 CFR 257 Subpart D herein referred to as the CCR Rule. CCR is defined in 40 CFR §257.53, definition as follows:

“...CCR means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers...”

MDU developed a CCR Fugitive Dust Control Plan (FDCP; Rev 0) to satisfy the requirements described in 40 CFR §257.80, Air Criteria, as they apply to CCR units, roads, and other CCR management and material handling activities at Lewis & Clark. Lewis & Clark placed the FDCP in the facility's operating record on October 15, 2015, as required by 40 CFR §257.105(g)(1).

2.0 Objective

MDU has compiled this annual report on CCR fugitive dust control for Lewis & Clark to meet the objectives of 40 CFR §257.80(c). The annual report includes the following:

- a description of the actions taken by the owner or operator to control CCR fugitive dust,
- a record of all citizen complaints,
- a summary of any corrective measures taken,
- a summary regarding compliance with Section 5 (CCR Fugitive Dust Emission Monitoring) of the FDCP (Rev 0), and
- a documentation of compliance with CCR Rule reporting requirements.

3.0 Fugitive Emission Sources

Lewis & Clark's CCR FDCP (Rev 0) identifies sources where possible emissions occur in the process of transporting CCR resulting from power generation at the facility.

In 2023, the site was closed and therefore there were no known fugitive emission sources present. The only operations at the site were to aid the growth of previously seeded vegetation.

4.0 Operating Procedures and Control Measures

In 2023, Lewis & Clark was closed, and no operations were ongoing except those related to encouraging vegetative growth.

5.0 Monitoring and Recordkeeping

40 CFR §257.80(b)(4), Air Criteria, stipulates that, *"The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan."* A person other than a professional engineer may perform monitoring responsibilities.

The CCR FDCP (Rev 0) addressed the three (3) main monitoring responsibilities:

- Keep a record of the citizen complaints and corrective measures implemented to address these complaints.
- Assess the effectiveness of dust control measures at least annually.
- MDU personnel will monitor and document meteorological conditions as it applies to site CCR fugitive dust emissions.

MDU has a history of positive communication with the community. As required by 40 CFR §257.80(b)(3), Lewis & Clark personnel maintained a log for any citizen complaints regarding CCR fugitive dust events at the facility and any corrective actions taken. In 2023, no CCR units were located on site due to their removal and associated reclamation. Personnel located at Lewis & Clark did not receive any citizen complaints; therefore, no corrective actions were required or performed.

Lewis & Clark personnel monitor operations and meteorological conditions. The record of meteorological conditions as they apply to fugitive dust is maintained by MDU.