

Gibbons Creek Environmental Redevelopment Group, LLC (GCERG)

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Date: January 12, 2023

To: Gibbons Creek Environmental Redevelopment Project Operating Record

RE: 2022 Annual Coal Combustion Residual (CCR) Fugitive Dust Control Report
Gibbons Creek Site F Landfill, Former Ash Handling Complex, Former Scrubber
Sludge Pond, Former Gypsum Pile, Former CCR Ponds A-C

Introduction

This report is the Annual CCR Fugitive Dust Control Report required by the United States Environmental Protection Agency (EPA) CCR Resource Conservation and Recovery Act (RCRA) Rule. It describes the actions taken at the Gibbons Creek Environmental Redevelopment Project (Gibbons Creek) for minimizing fugitive dust emissions from CCR. The Gibbons Creek facility is located at 12824 FM 244 in Anderson, Texas, and was formerly a coal-fired electric generating power plant that ceased operation in 2018. Ownership of the plant site was transferred from Texas Municipal Power Authority (TMPA) to the Gibbons Creek Environmental Redevelopment Group, LLC (GCERG) in 2021 to begin site decommissioning.

This annual report has been developed and placed in the facility Operating Record in accordance with 40 CFR 257.80 and 40 CFR 257.105(g), as well as posted to the public website within 30 days of preparation in accordance with 40 CFR 257.107(d). This report is required to include a description of the actions taken by company personnel or contractors to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken.

Fugitive Dust Control Activities

The Gibbons Creek plant ceased electric power generation in 2018 and began decommissioning activities in 2021. As previously stated, the decommissioned plant site transferred out of TMPA ownership in early 2021. The only applicable units under the RCRA regulation are the Former Ash Ponds A, B, and C, Former Scrubber Sludge Pond, Site F Landfill, Former Gypsum Pile, and the Former Ash Handling Complex. The Former Ash Ponds A-C, Former Scrubber Sludge Pond, Former Gypsum Pile, and Former Ash Handling Complex were remediated and clean closed in accordance with Federal CCR regulations in 2022. Placement of CCR materials continues in the Site F Landfill which is actively monitored for dust. Water is primarily being applied using water trucks and broadcast sprinklers to active excavation areas to minimize fugitive dust generation. Existing vegetation is being left in place in areas that are not to be disturbed to mitigate fugitive dust generation. Water is also applied to surrounding access roadways and have equipment operations with a 15-mph maximum speed limit observed. Daily site observations for fugitive dust are made by site personnel and recorded in the fugitive dust observation log that is kept as part of the site fugitive dust control plan and are kept as part of the site operating record.

Citizen Complaints

There were no citizen complaints received by GCERG concerning fugitive dust at the Gibbons Creek facility for the time January 1, 2022, through December 31, 2022; therefore, no corrective actions were warranted in response.

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Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a regular basis in accordance with the Fugitive Dust Control Plan. Corrective as well as preventative measures are properly implemented as warranted, including limiting vehicle speed and spraying water and dust suppressant chemicals for fugitive dust control. There were no specific corrective actions required over the course of the last year.

Conclusion

A dust control plan was prepared by GCERG for the Gibbons Creek facility on March 3, 2021, wherein site practices and other applicable aspects of site activities were reviewed. No issues were noted as part of the prior fugitive dust control plan review and current plan preparation. A copy of the current Fugitive Dust Control Plan is available on the GERG CCR Compliance website: <https://gcerg-crrule.com>