

2024 Annual Fugitive Dust Control Report

Coyote Station Plant – Blue Pit

Date: December 4, 2024

Introduction

This report fulfills the requirements of 257.80(c) in the Coal Combustion Residual (CCR) rule that went into effect in October of 2015. This report is for the Blue Pit landfill for the Coyote Station Plant is located in Mercer County, North Dakota. This Annual Report covers the time period from December 2023 to December 2024.

Section 257.80(c) of the CCR requires three segments for the completion of this report. The first is actions taken by the owner/operator to control CCR fugitive dust. The second is a record of all citizen complaints. The third is a summary of any corrective measures taken. See Table 1 for citizen complaints.

Actions taken to control CCR fugitive dust

The following Best Management Practices have been identified as CCR fugitive dust control measures at the Coyote Plant.

Water

- Fugitive dust is largely controlled by the use of water. Water is used to condition the CCR prior to its transfer from silos to transport vehicles and is also used to wet the in-place CCR and haul roads as needed.

Vehicle Speed Control

- Drivers are instructed to travel no faster than 25 miles per hour when traveling to and from CCR disposal areas.

Minimize the Open Working Area

- The working face of the landfill or CCR unit will be as small as is practicable to prevent erosion. This is accomplished by installing intermediate and final cover to reduce footprint size.

Vehicle covering

- Occasionally other vehicles may be used to transport CCR. These vehicles will be enclosed or covered during transport if fugitive dust is a concern.

Curtailling operations

- In extreme weather events, transport of CCR will be reduced or delayed until conditions improve.

Table 1
Citizen Complaint Record

Fugitive Dust Citizen Complaint			
Date	Citizen Complaint	Was complaint confirmed (Yes/No)	Corrective Measures Taken
10/11/24	Citizen complaint to the State of ND on Oct. 5, 2024. State relayed the complaint to OTP on Oct. 11, 2024	Yes	See attached response to State of ND. Regional conditions that day were sustained wind speeds of 35 to 45 mph with gusts up to 65 mph. No CCR hauling occurred on this day.

Summary of corrective measures taken

See the attached correspondence with the North Dakota Department of Environmental Quality below.

Hollen, Josh

From: Hollen, Josh
Sent: Wednesday, October 16, 2024 11:29 AM
To: Quach, Anthony
Subject: RE: Ash Complaint
Attachments: 2023 - Coy Fugitive Dust Control Plan.pdf

Hi Anthony,

Thank you for your email on October 11, 2024, about a citizen complaint of fugitive dust from the Coyote Station Blue Pit Landfill. Per your email, the citizen was concerned about dust blowing over State Highway 49 on Saturday, October 5, 2024.

Saturday, October 5th was an extremely windy day. Past weather data for that day indicate wind speeds of 35 to 45 mph for the day with reported wind gusts of up to 65 mph on several occasions. Regarding dust mitigation efforts, no ash hauling, or other solid waste activities occurred at the Blue Pit on the day in question.

Please see the attached Fugitive Dust Control Plan for the Blue Pit. Best management practices for controlling fugitive dust may include adding some water to the ash to limit dust creation, controlling vehicle speed if we are hauling ash, or discontinue hauling ash for the day if it is too windy. Plant personnel are trained on identifying blowing fugitive dust conditions and can take the necessary actions to control fugitive dust whenever present. Our approach of suspending all ash hauling activity on October 5th was in line with our best management practices during excessive windy conditions.

Please let me know if you have any additional concerns or questions.



Josh Hollen

Environmental Compliance
Environmental Services [

Phone: (218) 739-8314

otpc.com

From: Quach, Anthony <aQuach@nd.gov>
Sent: Friday, October 11, 2024 2:22 PM
To: Hollen, Josh <jhollen@otpc.com>
Subject: Ash Complaint

This is an EXTERNAL email. DO NOT open attachments or click links in suspicious email.

Hi Josh,

A citizen had called the division of Waste Management today regarding ash/dust blowing over Hwy 49 last Saturday October 5, 2024. The individual in question wants to know what the Otter Tail Power Coyote Station is doing to reduce or eliminate dust issues.

Thanks,

Anthony Quach

Division of Waste Management • Solid Waste Program

701-328-5156 • 701.328.5200 (fax) • aquach@nd.gov • <https://deq.nd.gov/>

