

Coal Combustion Residuals Landfill Annual Fugitive Dust Control Report

Boardman Power Plant

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Portland General Electric

Purpose

This Coal Combustion Residuals (CCR) annual fugitive dust control report fulfills the requirements of 40 CFR §257.80(c) for owners or operators to prepare an annual fugitive dust control report. It identifies how the fugitive dust control plan prepared for Portland General Electric Company (PGE) was utilized by the Boardman Power Plant (the Facility), measures taken to control CCR fugitive dust, corrective measures taken and any citizen complaints received.

The Fugitive Dust Control Plan was placed into the record on October 16, 2015; it is available in the facility's operating record and PGE's website at <https://www.portlandgeneral.com/corporate-responsibility/environmental-stewardship/ccr-rule-compliance-data-information> . The previous annual dust control report was placed in the operating record on December 15, 2017; therefore, this report must be placed in the facility's operating record by December 15, 2018.

Citizen Complaints:

No citizen complaints regarding CCR fugitive dust have been received by the Facility.

Corrective Measures:

No corrective measures regarding CCR fugitive dust have been taken by the Facility.

CCR Facility Dust Control Plan Assessment and Related Review:

An assessment of the Fugitive Dust Control Plan occurred in November 2018; no changes were identified during this review. Inspections of the CCR landfill are completed on a daily basis. In addition, a visual inspection of CCR handling, transportation and disposal processes were completed in November 2018. Annual site specific CCR Facility Dust Control Plan training was performed in January 2018.

Actions Taken to Control CCR Fugitive Dust:

From December 2017 to December 2018, dust control procedures, including daily inspections for fugitive dust, have been implemented as discussed by the Fugitive Dust Control Plan, a summary is provided below:

Selected Measures	Applicable and Appropriate Explanation
Handle CCR in enclosed or partially enclosed facilities	Ash handling systems that transport ash from the point of origin within the Facility to the ash loading facility are enclosed. Any ash stored at the ash loading facility prior to disposal is stored in enclosed silos, domes or hoppers, or within open water filled reservoirs. These measures effectively contain fugitive dust.
Transfer CCR through flexible tubing to enclosed trailers	Use of flexible tubing directly inserted into enclosed trailers minimizes the amount of fugitive dust that would otherwise be created by dumping ash from heights in an uncontained manner.
Damp or enclosed transportation	Transporting material damp is a common and proven method of dust control. Transporting dry ash in enclosed trailers effectively contains fugitive dust during transit.
Site security	Maintaining control of site access prevents use of haul roads and the CCR landfill by unauthorized vehicles.
Paved roads	Paved roads minimize the potential for dust created by vehicles and can be cleaned when needed if dirt or CCR accumulates on the road.
Vehicle speed limit	Vehicle speed limits minimize the amount of dust created on the small portion of roads that are not paved.
Dust suppression/conditioning of CCR landfill and haul roads	Application of dust suppressant, such as water or other product, is a common and proven method of dust control on roads and for conditioning ash.
Minimize size of disturbed area	Minimizing the size of disturbances created by the placement or removal of ash minimizes the surface area that could contribute to wind erosion.
Cessation of activities during high wind activity	Ceasing disposal activities during high wind minimizes sources of fugitive dust.