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March 5, 2025

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RE: Grand River Dam Authority
Solid Waste Permit No. 3549012
2024 Annual CCR Fugitive Dust Control Report

Introduction

The purpose of this letter is to provide an annual CCR fugitive dust control report for the Grand River Dam Authority Grand River Energy Center, located in Chouteau, Oklahoma. The requirement for this report is found in Oklahoma Administrative Code (OAC) 252:517-13-1(c). This report describes the actions taken by GRDA to control CCR fugitive dust, provides a record of citizen complaints, if any, and a summary of any corrective measures taken.

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This report is subject to the recordkeeping requirements specified in OAC 252:517-19-1(g), the notification requirements of OAC 252:517-19-2(f), and the CCR web site requirements specified in OAC 252:517-19-3(g). This letter serves as notification that this report has been placed in the facility operating record and has been placed on the GRDA CCR website.

General Description of CCR Facility

The Grand River Energy Center (GREC) is located three (3) miles east of Chouteau, Oklahoma on Highway 412. There are two coal fired boilers at GREC, and these are referred to as Unit 1 and Unit 2. Both Units 1 and 2 produced Coal Combustion Residue (CCR). Unit 1 was retired in 2020, and no longer produces CCR. A combined cycle natural gas fueled facility, referred to as Unit 3, has been built, and

is commissioned. In addition, construction began in 2024 on a new single-cycle natural gas plant, designated as Unit 4. Once this facility is operational in 2026, Unit 2 will permanently shut down and no additional CCR waste will be generated onsite.

The primary CCR produced is called fly ash. Fly ash is collected and then transported to the ash storage silos using pneumatic piping.

The secondary CCR produced is called bottom ash, and bottom ash is initially collected at the bottom of the boiler. Bottom ash has a granular and gravel texture and is dampened with water during collection. Fugitive dust is therefore inherently minimized.

Fly ash CCR from the Unit 2 boiler is collected after a sulfur dioxide scrubber, and is sold for beneficial purposes. Fly ash that is not sold for beneficial purposes is transported to an on-site permitted CCR landfill. Fly ash from Unit 2 that needs to be transported to the landfill is conveyed downward from the storage silos to Pin & Paddle Mixers, which mix water with the fly ash CCR to produce conditioned CCR for fugitive dust control. This Conditioned CCR is loaded into trucks inside a contained loading zone beneath the storage silos. The trucks then transport the conditioned CCR to the permitted on-site landfill.

Enclosed trucks transporting CCR off-site are rinsed with water as necessary at an on-site Truck Wash Station.

CCR Fugitive Dust Control Measures Implemented

The Grand River Dam Authority GREC facility utilizes the following CCR fugitive dust control measures:

Locating CCR inside an enclosure or partial enclosure

An appropriate partial enclosure is located underneath the ash storage silos. Pin and Paddle Mixers for mixing in water and thus producing Conditioned CCR are located above the partial enclosure.

Operating a water spray or fogging system

An appropriate water spray system is located at the entrance to the partial enclosure beneath the ash silos. Water trucks are used to produce wide-pattern water sprays for Fugitive Dust Control on roads and landfill operations.

Reducing fall distances at material drop points

Appropriate loading chutes are utilized for loading trucks. Dry CCR for off-site sale is loaded in covered trucks using a telescoping chute, equipped with vacuum system and a baghouse. An extended loading chute with flexible panels is used for loading of Conditioned Ash from Pin & Paddle Mixers.

Using wind barriers, compaction, or vegetative covers

The CCR landfill has sloped sides that have a vegetative cover on the south and west sides, as well as most of the top, and is appropriate for the prevailing wind direction.

Establishing and enforcing reduced vehicle speed limits

The site speed limit is limited to 15 mph. The site has personnel that provide security and safety oversight 24 hours/day.

Paving and sweeping roads

Site roads are generally paved, and periodically wetted with a water truck.

Covered trucks transporting CCR

Trucks are used for transporting conditioned CCR to the ash landfill, and water is applied in the Pin & Paddle Mixers to reduce fugitive dust.

Reducing or halting operations during high wind events

Operations personnel are instructed to curtail ash landfill operations during extreme high wind events.

Applying daily cover

Water trucks are used to minimize fugitive dust, and application of a daily cover is not needed for the circumstances.

Applying cover according to closure and post closure plan

Completed landfill areas are covered with layers of clay and topsoil per the landfill requirements, and closure and post-closure plans.

Citizen Complaints

There were no citizen complaints in 2024, and there have not been any citizen complaints since the implementation of the CCR Fugitive Dust Control Plan in October 2015.

Plan Review and Corrective Measures

In accordance with OAC 252:517-13-1(b)(4), GRDA conducted an annual assessment of the CCR Fugitive dust control plan on March 4, 2025.

The plan was reviewed to determine if the written plan is comprehensive, effective, and current. Minor administrative changes were identified, and the plan will be updated.

CCR handling equipment was assessed for operational readiness and good housekeeping. Weekly and annual CCR landfill inspections were reviewed for proper landfill condition.

A written summary of the review will be placed in the operating record.

If you have any questions, please do not hesitate to contact me at (918) 824-7565 or, if more convenient, via e-mail at mike.bednar@grda.com.

Sincerely,



Michael L. Bednar
Manager of Environmental Compliance
Grand River Dam Authority