SOUTHWESTERN ELECTRIC POWER COMPANY

H.W. PIRKEY POWER PLANT



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

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and

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1.0 INTRODUCTION

This Annual CCR Fugitive Dust Control Report (Annual Report) has been prepared pursuant to the air criteria of 40 CFR Part 257.80. The Annual Report summarizes activities described in the CCR fugitive dust control plan (Plan) and includes the following components: description of actions taken to control CCR fugitive dust; a record of all citizen complaints; and a summary of any corrective measures taken.

The initial H.W. Pirkey Power Plant CCR fugitive dust control plan was placed into the operating record on October 14, 2015. This Annual Report addresses the period from September 23, 2018 to September 20, 2019. The Annual Report is deemed complete when it is placed in the facility's operating record as described in Section 6.0. The deadline for completing subsequent Annual Reports is one year after the date of completing the previous report.

The Annual Report will be placed in the operating record and retained in the office of the Pirkey Plant Environmental Coordinator (PEC). The Plan will also be placed on Pirkey Plant's publicly accessible internet website titled "CCR Rule Compliance Data and Information" as described in Section 6.0.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

General Information:

Name of Facility: Southwestern Electric Power Company – H.W. Pirkey Power

Plant

Street: 2400 FM 3251

City, State, Zip Code: Hallsville, TX 75650

County: Harrison

Latitude: 32° 27'43" N Longitude: 94° 29' 07" W

2.2 Contact Information

Facility Operator:

Name: Southwestern Electric Power Company – H.W. Pirkey Power Plant

Attention: Joel Endsley - Plant Manager

Address: 2400 FM 3251

City, State, Zip Code: Hallsville, TX 75650

Facility Owner:

Name: Southwestern Electric Power Company.

Northwest Texas Electric Coop, Inc.
Oklahoma Municipal Power Authority

Attention: Bruce Moore - Manager, Air and Water Quality, West

Address: <u>1201 Elm Street, Suite 4100</u> City, State, Zip Code: <u>Dallas, TX 75270</u>

Plan Contact:

Name: <u>Samantha McDonald – Pirkey Plant Environmental Coordinator (PEC)</u>

Address: 2400 FM 3251

City, State, Zip Code: Hallsville, TX 75650

Telephone number: 903-927-5853 Email address: ssmcdonald@aep.com

2.3 Facility Description

The Pirkey Power Plant is located in Northeast Texas. The H.W. Power Plant made history for AEP-SWEPCO as the first plant built by the company to use lignite as its primary fuel source. Compared to other forms of coal, lignite contains a smaller amount of fixed carbon and has a lower heating value, but is plentiful and close to the surface where it is mined. Sabine Mining Company, a subsidiary of North American Coal Corporation, provides the lignite burned at Pirkey. Pirkey, a 675 MW plant, is co-owned by AEP SWEPCO, Northeast Texas Electric Coop. and Oklahoma Municipal Power Authority. AEP-SWEPCO manages and operates the plant on behalf of its co-owners.

See the Plan for a further description of plant activities and fugitive dust controls.

3.0 FUGITIVE DUST CONTROLS

The following fugitive dust control measures were implemented during the period addressed by this Annual Report:

Plant Activity	Fugitive Dust Control Measures
Plant and Landfill Roadways	Roadways were watered as needed and speed control measures were implemented; material carried off plant property and deposited onto public highways by vehicular traffic or erosion by water was removed and disposed of properly.
CCR – Stackout Area	Emissions from this area are controlled by maintaining moisture in the material and watering as needed.
Landfill – unloading and placement of material	Unloading emissions were controlled by maintaining moisture in the material, taking precautionary measures (minimizing drop height) and watering as needed; spreading and compacting emissions were controlled by maintaining vehicle speed, maintaining moisture in the material, and watering as needed.
Landfill – wind erosion	Wind erosion control measures for open areas included: precautionary measures such as minimizing the amount of open area and pile height; compacting material as it was unloaded; maintaining moisture content of the materials, and watering as needed.
Bottom Ash Pond	Emissions were controlled by the inherent moisture of the material and timely loading of trucks; and watering as needed.

Note: Implementation of control measures will not be necessary for roadways that are covered with snow and/or ice or if sufficient precipitation occurs to minimize or eliminate fugitive dust. Implementation of any control measures may be suspended if unsafe or hazardous driving conditions would be created by its use.

4.0 CITIZEN COMPLAINT LOG

4.1 Plan Contacts

Generally, complaints made to the plant are by telephone and received by the PEC (Plan Contact). In the case of holiday, weekends, or other times when the PEC may not be onsite, the plant guard houses or plant general phone number may receive complaint information by telephone that is provided to the PEC at the earliest convenience. Complaints may also be made to TCEQ who in turn will contact the PEC. No complaints were received by the Plant PEC during the period addressed by this Annual Report.

4.2 Follow-up

All complaints will be entered into a log by the PEC with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be followed up which may include: checking plant operations at the time of the event, reviewing inspection records, discussing with other plant personnel, reviewing weather data, collecting samples and contacting the person making the complaint to obtain additional information. No complaint follow-up was necessary during the period addressed by this Annual Report.

4.3 Corrective Action and Documentation

Corrective actions will be taken as needed and documented. If it is determined that the Plan needs to be amended as a result of the corrective actions, it will be amended in accordance with the Plan. If possible, the PEC will follow-up with the complainant and/or TCEQ to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report. No corrective actions due to complaints were necessary during the period addressed by this Annual Report.

5.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended. The PEC reviewed the inspection records when preparing this Annual Report to assess the effectiveness of the Plan and determined that no additional or modified measures were warranted.

6.0 RECORDKEEPING, NOTIFICATION and INTERNET REQUIREMENTS

6.1 Recordkeeping

The Annual Report and the Plan (and any subsequent amendment of the plan) will be kept in the facility's operating record as they become available. The Plan and files of all related information will be maintained in a written operating record at the facility for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, record or study. Only the most recent Plan must be maintained in the record. Files may be maintained on a computer or storage system accessible by a computer. One recordkeeping system may be used for the APS and Landfill if the system identifies each file by the name of each unit (i.e. APS or Landfill).

6.2 Notification

The Director of the TCEQ will be notified within 30 days of when the Annual Report is placed in the operating record and on the publicly available internet site. This notification will be made before the close of business on the day the notification is required to be completed. "Before the close of business day" means the notification must be postmarked or sent by e-mail. If the notification deadline falls on a weekend or federal holiday, the notification is automatically extended to the next business day.

6.3 Internet Site Requirements

The most recent Annual Report will be placed on the facility's CCR website titled "CCR Rule Compliance Data and Information" within 30 days of placing it in the operating record.