

# **KENTUCKY POWER COMPANY**

## **MITCHELL PLANT**



# **ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

Prepared By:

**Kentucky Power Company**  
**Mitchell Plant**  
State Route 2  
Moundsville, WV 26041

and

**American Electric Power Service Corporation**  
**Environmental Services**  
1 Riverside Plaza  
Columbus, Ohio 43215

**September 2017**

# Table of Contents

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<b>1.0 Introduction.....</b>	<b>1</b>
<b>2.0 Facility Description and Contact Information .....</b>	<b>1</b>
<b>2.1 Facility Information .....</b>	<b>1</b>
<b>2.2 Contact Information.....</b>	<b>1</b>
<b>2.3 Facility Description .....</b>	<b>2</b>
<b>3.0 Fugitive Dust Controls .....</b>	<b>3</b>
<b>4.0 Citizen Complaint Log .....</b>	<b>4</b>
<b>4.1 Plant Contacts .....</b>	<b>4</b>
<b>4.2 Follow-up .....</b>	<b>4</b>
<b>4.3 Corrective Actions and Documentation.....</b>	<b>4</b>
<b>5.0 Plan Assessment .....</b>	<b>4</b>
<b>6.0 Recordkeeping, Notification and Internet Requirements.....</b>	<b>5</b>
<b>6.1 Recordkeeping.....</b>	<b>5</b>
<b>6.2 Notification.....</b>	<b>5</b>
<b>6.3 Internet Site Requirements .....</b>	<b>5</b>

## 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 Mitchell CCR fugitive dust control plan was placed into the operating record on September 22, 2015. The initial Annual Report was completed and placed into the facility's operating record on September 30, 2016. The current Annual Report addresses the period from September 22, 2016 to September 19, 2017. 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 Mitchell Plant Environmental and Lab Supervisor. The Plan is also available on Mitchell 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: Kentucky Power Company – Mitchell Plant

Street: State Route 2

City: Moundsville State: WV ZIP Code: 26041

County: Marshall

Latitude: 39° 49' 46" N Longitude: 80° 48' 58" W

### 2.2 Contact Information

#### Facility Operator:

Name: Kentucky Power Company – Mitchell Plant

Attention: Dan Moyer - Plant Manager

Address: State Route 2

City, State, Zip Code: Moundsville, West Virginia 26041

**Facility Owner:**

Name: Kentucky Power Company/Wheeling Power Company  
Attention: John Hendricks – Director, AQS  
Address: 1 Riverside Plaza  
City, State, Zip Code: Columbus, Ohio 43215

**Plan Contact:**

Name: Jeffrey Palmer – Mitchell Plant Environmental and Lab Supervisor  
Address: State Route 2  
City, State, Zip Code: Moundsville, West Virginia 26041  
Telephone number: 304-843-6051  
Email address: [jwpalmer@aep.com](mailto:jwpalmer@aep.com)

***2.3 Facility Description***

The Mitchell Plant is located along the Ohio River near Moundsville, West Virginia, and consists of a two coal-fired, steam electric generating units, each nominally rated at 800 megawatts. Kentucky Power Company co-owns the facility with Wheeling Power Company. Kentucky Power Company operates the facility. 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:

<b>Plant Activity</b>	<b>Fugitive Dust Control Measures</b>
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.
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 Plant Environmental and Lab Supervisor (Plan Contact). In the case of holiday, weekends, or other times when the Plant Environmental and Lab Supervisor may not be onsite, the plant guard house or plant general phone number may receive complaint information by telephone that is provided to the Plant Environmental and Lab Supervisor at the earliest convenience. Complaints may also be made to West Virginia DEP who in turn will contact the Plant Environmental and Lab Supervisor. The Plant Environmental Coordinator was notified on February 17, 2017 of a single public complaint received by the Plant. The complaint was related to dust being generated during the unloading of fly ash from a vacuum truck at the landfill.

### ***4.2 Follow-up***

All complaints will be entered into a log by the Plant Environmental and Lab Supervisor 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. The February 17, 2017 public complaint was logged in the CCR fugitive dust inspection records. The Plant Environmental Coordinator followed up with the corporate environmental staff and then landfill operations staff, determining that additional water could be utilized to increase the moisture content of the material as it was being unloaded to minimize fugitive dust generated during the unloading process.

### ***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 Plant Environmental and Lab Supervisor will follow-up with the complainant and/or West Virginia DEP to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report. In response to the February 17, 2017 public complaint, additional water was utilized to increase the moisture content of the material to minimize fugitive dust. No amendment to the plan was necessary, as the plan currently identifies utilizing moisture content of the material and watering as

means of minimizing fugitive dust during the unloading and placement process. No further follow-up was deemed necessary.

## **5.0 PLAN ASSESSMENT**

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended. **The Plant Environmental and Lab Supervisor 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 BAP and Landfill if the system identifies each file by the name of each unit (i.e. BAP or Landfill).

### ***6.2 Notification***

The West Virginia DEP 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.