

AEP GENERATION RESOURCES

BIG SANDY PLANT



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

AEP Kentucky Power Inc.
Big Sandy Plant
23000 Highway 23
Louisa, KY 41230

and

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

September 2018

Table of Contents

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

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.

This Annual Report must be completed no later than 14 months after placing the initial Plan in the facility's operating record. The initial Big Sandy CCR fugitive dust control plan was placed into the operating record on September 16, 2015 (and revised September 2018). This Annual Report addresses the period from September 16, 2017 to September 15, 2018. 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 Big Sandy Plant Environmental Coordinator (PEC). The Plan will also be placed on Big Sandy 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: AEP Kentucky Power, Inc. – Big Sandy Plant

Street: 23000 Highway 23

City: Louisa State: KY ZIP Code: 41230

County: Lawrence

Latitude: 38° 10' 7" N Longitude: 82° 37' 15" W

2.2 Contact Information

Facility Operator:

Name: AEP Kentucky Power

Attention: Paul Massie - Plant Manager

Address: 23000 Highway 23

City, State, Zip Code: Louisa, KY 41230

Facility Owner:

Name: Kentucky Power
Attention: Scott Weaver - Director, AQS
Address: 1 Riverside Plaza, 17th Flr.
City, State, Zip Code: Columbus, Ohio 43215

Plant Contact:

Name: Donald Duncan – Big Sandy Plant Environmental Coordinator (PEC)
Address: 23000 Highway 23
City, State, Zip Code: Louisa, KY 41230
Telephone number: 606-686-1466
Email address: ddduncan2@aep.com

2.3 Facility Description

The Big Sandy Power Plant is located along the bank of the Big Sandy River in Louisa, KY, and currently consists of one gas-fired electric generating unit. Kentucky Power Co. owns and operates Big Sandy's nominally rated 268-megawatt Unit 1. Unit 1 (BSU1) was converted from a coal-fired to a gas-fired unit in early 2016, coming online at the end of May, 2016. 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; when material carried off plant property is deposited onto public highways by vehicular traffic, it is removed and disposed of properly. However, no occurrences of this scenario occurred during this reporting period. |
| Bottom Ash – 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. Bottom Ash unloading activities are no longer performed since coal usage ceased in 2015. |
| Bottom Ash Pond – wind erosion | Wind erosion control measures for open areas included precautionary measures including watering as needed. Removal of CCR from this pond is complete. The area will be relined and utilized for plant wastewater. The Plan was modified in September 2018 to reflect this change. |
| Bottom Ash Pond | Emissions were controlled by the inherent moisture of the material and watering as needed. A bottom ash stockpile was created near the FAR in order to be used for closure of the flyash pond (see note above in bold). See above statement regarding the current status of the BAP. |
| Fly Ash Reservoir | No flyash was produced during this reporting period. Due to the wet condition of the ash, the pond typically has no fugitive emissions. If extreme conditions occur, the plant is prepared to adjust the pond level to inundate the exposed dry areas. Also, construction is underway to close this pond. Precautions are being taken to minimize fugitive emissions during this process including continuous use of water trucks during construction hours/activities. Expected closure of this area is expected to occur by 4Q 2020. |

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 Plant 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 Kentucky DAQ 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 Kentucky DAQ 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.

6.2 Notification

Kentucky DAQ – Ashland Regional Office as well as the Kentucky DAQ SEDO 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.