

KENTUCKY POWER COMPANY

MITCHELL PLANT



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

**Kentucky Power Company
Mitchell Plant**
8999 Energy Rd.
Moundsville, WV 26041

and

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

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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.

This Annual Report addresses the period from September 20, 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 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: 8999 Energy Rd.

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: Douglas J. Rosenberger - Plant Manager

Address: [8999 Energy Rd.](#)

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

Facility Owner:

Name: Kentucky Power Company/Wheeling Power Company
Attention: Scott A. Weaver – Director, AQS
Address: 1 Riverside Plaza
City, State, Zip Code: Columbus, Ohio 43215

Plan Contact:

Name: Matt Palmer – Mitchell Plant Environmental Coordinator
Address: [8999 Energy Rd.](#)
City, State, Zip Code: Moundsville, West Virginia 26041
Telephone number: 304-843-6048
Email address: gmpalmer@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:

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.
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 Coordinator (Plan Contact). In the case of holiday, weekends, or other times when the Plant Environmental Coordinator 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 Coordinator at the earliest convenience. Complaints may also be made to West Virginia DEP who in turn will contact the Plant Environmental

Coordinator. The Plant Environmental Coordinator was notified twice during the period covered by this annual report. On May 2, 2018, the first public complaint was received from a local resident, located approximately 2-2.5 miles south of the Mitchell Plant. The complainant asked that AEP power wash his home because he felt that our operations had resulted in material being deposited on his home. On May 17, 2018, the second complaint for the reporting period was received in a telephone call from the West Virginia Department of Environmental Protection (WVDEP). The WVDEP inspector indicated that a nearby resident (approximately 4 miles southeast of the Mitchell Plant location) had called the WVDEP and stated that fruit trees were dying on his property. The resident did not name AEP or indicate that AEP may be responsible. Because the Mitchell Plant was in close proximity to the residence, the WVDEP inspector simply asked for the plant staff at Mitchell Plant to review site emissions just prior to the May 17, 2018 date.

4.2 Follow-up

All complaints will be entered into a log by the Plant Environmental Coordinator 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 May 2, 2018 complaint was logged in the CCR fugitive dust inspection records. In response to the complaint, plant personnel reviewed weather data and checked plant operations and emissions data for the period prior to the date of the complaint. Plant operations and emissions were normal. Generally, winds were from the southwest (blowing from the residence towards the Mitchell Plant property). Nevertheless, plant staff visited the residence to observe the material on the home. The material appeared most likely to be mold or algae growth on the shaded areas of the siding, gutters, fascia, roof and porch (photographs were taken). The material was not dusty at all. In response to the May 17, 2018 discussion with the WVDEP inspector concerning a resident's inquiry concerning dying fruit trees, the Mitchell Plant checked plant operations and emissions and determined the both were normal on or around May 17, 2018. There was no reason to believe that plant operations or more specifically, CCR unit operations at Mitchell Plant, were connected in any way to the resident's dying fruit trees. Further, the resident did not indicate that there was any material deposited on his property.

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 Coordinator 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. After investigating the May 2, 2018 complaint, the resident was informed that the material on his home was not a result of the Mitchell Plant operations. In response to the May 17, 2018 discussion with the WVDEP inspector, the Mitchell Plant staff reviewed plant emissions on or around May 17, 2018, Mitchell Plant staff informed the WVDEP inspector that all emissions were normal. No additional follow-up was requested or deemed necessary.

5.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended. **The Plant Environmental Coordinator 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 the operating record 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 operating 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.