

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

September 2019

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	3
4.1 Plant Contacts	3
4.2 Follow-up	4
4.3 Corrective Actions and Documentation.....	4
5.0 Plan Assessment	5
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 addresses the period from September 15, 2018 to September 15, 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 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 once during the period covered by this annual report. On April 19, 2019, a complaint was received in an email from the West Virginia Department of Environmental Protection (WVDEP). The WVDEP inspector indicated that a nearby resident had contacted WVDEP on April 18, 2019 and stated that that heavy equipment operating on the Mitchell Plant landfill site was creating dust that was traveling off plant property and onto local residences. The resident lives approximately ½ mile from the Mitchell Plant landfill property. The WVDEP inspector asked the Plant Environmental Coordinator at Mitchell Plant to look into the landfill activities so that follow up could be made with the local resident.

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 April 19, 2019 complaint was logged in the CCR fugitive dust inspection records. Plant personnel reviewed plant landfill operations for April 18, 2019 (the date that the resident complained of fugitive dust). It was verified that there was heavy equipment working on the landfill on that day. Landfill staff indicated that there was some fugitive dust in the cell area of the landfill but none was observed on the roadways. On the date of the complaint, dump trucks containing conditioned (moistened) ash were placing ash in the landfill as well as vacuum trucks (three during the course of the day) were placing ash in the landfill. Plant staff confirmed that the facility water truck was operating as normal to minimize fugitive dust. Plant staff also reviewed with landfill staff the need to stay diligent in work to minimize fugitive dust during the normal operations. The efforts reinforced during the discussions were continued use of the water truck and insuring that sufficient water was being used to condition the transported ash. The Plant Environmental Coordinator followed up by telephone with the WVDEP local enforcement inspector and reviewed the landfill log with him. The inspector did not indicate that any additional follow up would be necessary and said that he would call the local resident to discuss.

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 April 19, 2019 complaint, the Mitchell Plant Environmental Coordinator informed the WVDEP inspector that activities and fugitive dust emissions on the landfill were found to be normal and that efforts to minimize fugitive dust were in place and being utilized as required by the dust plan. The landfill log from the day of the complaint was provided to the WVDEP inspector for his use in following up with the local resident. 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.