

PUBLIC SERVICE COMPANY OF OKLAHOMA

OKLAUNION POWER STATION



FUGITIVE DUST CONTROL PLAN

Prepared By:

**Public Service Company of Oklahoma
Oklaunion Power Station**
12567 Farm Road 3430
Vernon, Texas 76384

and

**American Electric Power Service Corporation
Environmental Services**
1201 Elm Street, Suite 4100
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Revision 3 – July 2019

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Appendix A – 40 CFR Part 257.80 Air Criteria (Fed. Reg. April 17, 2015)

Appendix B – Figure 1-1 Oklaunion Power Station Site Map

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Appendix D – Plan Modification Documentation

Professional Engineer's Certification

By means of this certification, I certify that I have reviewed this CCR Fugitive Dust Control Plan and it meets the requirements of section 40 CFR 257.80(b).

DAVID ANTHONY MILLER

Printed Name of Registered Professional Engineer



David Anthony Miller

Signature

112498

TEXAS

07.16.19

Registration No.

Registration State

Date

1.0 INTRODUCTION

This CCR Fugitive Dust Control Plan (Plan) has been prepared pursuant to the air criteria of 40 CFR part 257.80 (see Appendix A). The Plan has been prepared in accordance with the air criteria and following good engineering practices to include measures that will effectively minimize CCR from becoming airborne at the facility. The Plan and subsequent amendments will be placed in the operating record and retained on the Administrative Bookshelf. The Plan and subsequent amendments will also be placed on Oklaunion Power Station's publicly accessible internet website titled "CCR Rule Compliance Data and Information." The plan will be amended whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit. Where appropriate, the Plan incorporates fugitive dust control requirements as contained in the Texas CEQ air permits issued for the plant.

There are five CCR surface impoundments located at Oklaunion Power Station that are subject to the Plan. The surface impoundments are Ponds 21 and 22 (wet and dry flue gas desulfurization fluid waste), Pond 23 (wet and dry ash / wet and dry flue gas desulfurization fluid waste), Wastewater/Sludge Pond (wet and dry flue gas desulfurization fluid waste), and Pond 6 (all facility CCRs). Oklaunion Power Station Pond 6 receives both the fly ash, bottom ash and flue gas desulfurization fluid waste when cleaning out Ponds 21 or 22. The Plan addresses these CCR units and the associated paved and unpaved roadways.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

Facility Information

Name of Facility: Public Service Company of Oklahoma – Oklaunion Power Station

Street: 12567 Farm Road 3430

City: Vernon State: TX ZIP Code: 76384

County: Wilbarger

LATITUDE 34-05-00 LONGITUDE 99-10-37

2.2 Contact Information

Facility Operator:

Name: Public Service Company of Oklahoma - Oklaunion Power Station

Attention: Steve Lewis - Plant Manager

Address: 12567 Farm Road 3430

City, State, Zip Code: Vernon, Texas 76384

Facility Owner:

Name: Public Service Company of Oklahoma

AEP Texas

Brownsville Public Utilities Board

Oklahoma Municipal Power Authority

Attention: Bruce Moore – Manager, Air & Water Quality – West

Address: 1201 Elm Street, Suite 4100

City, State, Zip Code: Dallas, Texas 75270

Plan Contact:

Name: Michael Bayes

Address: 12567 Farm Road 3430

City, State, Zip Code: Vernon, Texas

Telephone number: 940-886-2701

2.3 Activities at the Facility

The Oklaunion Power Station is located 8 miles Southeast of Vernon, Texas, and consists of one electric generating unit. Public Service Company of Oklahoma owns and operates Oklaunion's nominally rated 650-megawatt Unit 1. There are other minority owners such Public Utility of Brownsville, Texas, Oklahoma Municipal Power Authority and AEP Texas. Approximately 2.5 million tons of coals per year are converted to electricity at the Oklaunion Power Station, powering thousands of homes, businesses, schools, and industrial facilities.

The unit is equipped with wet flue gas desulfurization (FGD) technology. The waste slurry is non-routinely dewatered and transported by truck to Pond 6 located on Plant property approximately 0.5 mile south of the FGD systems.

Bottom ash is produced by Oklaunion Power Station and is collected off a conveyor drop in a damp state and transported to Pond 6 for storage and use as a construction material. Bottom ash that is not used for construction purposes ultimately resides in Pond 6.

The fly ash handling system is enclosed and located just ahead of the flue gas desulfurization process. The unit is equipped with an electrostatic precipitator for removal of fly ash from the flue gas and collection in hoppers and placed in overhead storage silo for dispensing to haul trucks for sale or to the Pond 6. The fly ash precipitator and storage silo is 0.5 mile from Pond 6.

2.4 Site Maps

A USGS site location map for the Plant is included as Figure 1-1 in Appendix B. Appendix C contains a USGS site location map for Pond 6 (Figure 2-1) and shows the property boundaries, surrounding topography and receiving waters.

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 Paved and Unpaved Roadways

3.1.1 Overview

Trucks are used to transport CCR primarily over plant unpaved roadways to Pond 6. Similarly, bottom ash trucks / front end loaders travel approximately 1.0 mile over unpaved plant roadways to the Pond 6 entrance. The applicable and adequate fugitive dust control measures were primarily selected in accordance with the measures contained in the Texas CEQ Air Permit for the plant roads. The roadways are also subject to visible emission limits as contained in the air permits. Periodically, public roads traveled by trucks may be addressed to minimize fugitive dust due to plant activity.

3.1.2 Pond 6 and Plant Roadways

The primary appropriate and applicable fugitive dust control measures for roadways are watering and speed controls. Water trucks are used as needed based upon the periodic inspections and other observations to minimize or eliminate fugitive dust. Speed limits are 20 mph for paved and unpaved roads. Earth or other materials that may be deposited onto paved roadways from trucks will be promptly removed to minimize fugitive emissions. 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.

3.2 Pond 6

3.2.1 Overview

Pond 6 receives fly ash, bottom ash, and flue gas desulfurization fluid waste from the Oklaunion Power Station. All of these are hauled by either converted pneumatic trailer (fly ash) or open top dump trucks (bottom ash and flue gas desulfurization waste). Recently Pond 6 has not required additional dust control measures. The air permits specify the applicable and appropriate fugitive dust control measures for the site to minimize or

eliminate fugitive emissions. The permit also includes visible particulate emissions limits as well as monitoring, recordkeeping and reporting requirements.

[**Note:** “conditioned” CCR means the material has sufficient moisture content to prevent wind dispersal but will not result in free liquids]

3.2.2 Unloading and Placement

Fly ash, bottom ash, and flue gas desulfurization fluid waste is unloaded from trucks into the active fill area of Pond 6 where a bulldozer or similar equipment will push into the low areas, spread and compact the materials. The fugitive dust control measures for truck unloading includes maintaining moisture in the material and taking precautionary measures (minimize drop height). The measures for spreading and compacting include maintaining vehicle speed and watering materials.

3.2.3 Wind Erosion

Generally, Pond 6 disposal areas can be classified as open, compacted, but not yet received final cover. The open area fugitive dust control measures include: precautionary measures such as minimizing the amount of open area and pile height; compacting material as it is unloaded; and watering. The bottom ash storage pile fugitive dust emissions are minimized by its normal damp condition, watering, and pile height control.

3.3 Fly Ash

Oklaunion Power Station fly ash that is not sold is delivered dry to Pond 6. Fly ash is unloaded from trucks into the active fill area of Pond 6 where a bulldozer or similar equipment will push into the low areas, spread and compact the materials. A review of potential control measures concluded that the applicable and appropriate options consist of: watering, and minimizing drop height. Water is applied to the fly ash to minimize fugitive emissions and condition the material, as needed. Enclosures and daily cover are not applicable given the size of the area and characteristics of the material.

3.4 Bottom Ash

Oklaunion Power Station bottom ash is produced by the unit and is constantly collected from a wet conveyor drop. It is collected in a front-end loader and moved by the loader or dump truck to Pond 6 for storage and use as a construction material, or disposal. The bottom ash typically remains damp, depending on the amount of moisture remaining in the ash and seasonal conditions, there may be fugitive emissions from the pile or truck loading activities. A review of potential control measures concluded that the applicable and appropriate options consist of: watering, and minimizing drop height. Water is applied to the pile to minimize

fugitive emissions as needed. Water spray is applied as needed to the material handling activities and the drop from the loader into the trucks is minimized to further minimize fugitive emissions. Enclosures, compaction and cover are not applicable given the size of the area and characteristics of the material.

4.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended in accordance with Section 7.0 below. Pond 6 and associated paved and unpaved roadways are inspected on a periodic basis. The purpose of the inspections is to determine if the control measures for each CCR unit as described above are being implemented as necessary to minimize or eliminate fugitive emissions. Records of inspections and the control measures implemented as a result of the inspections will be maintained. The PEC will periodically assess the effectiveness of the Plan and determine if additional or modified measures are warranted. No inspection is necessary if the surface is covered with snow and/or ice or if precipitation has occurred that is sufficient to minimize or eliminate fugitive emissions. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

5.0 CITIZEN COMPLAINT LOG

5.1 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 house 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 Texas CEQ who in turn will contact the PEC.

5.2 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.

5.3 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 necessary, the PEC will follow-up with

the complainant and/or Texas CEQ to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report.

6.0 ANNUAL REPORT

The Annual CCR fugitive dust control report (Annual Report) will be prepared which 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 Annual Report will be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing subsequent reports is one year after the date of completing the previous report. The Annual Report will be deemed complete when the plan has been placed in the facility's operating record as described in Section 8.0.

7.0 PLAN AMENDMENTS

This Plan is a "living" document and will be amended, as necessary, whenever there is a change in condition that would substantially affect the written plan in effect. The Plan will be amended in the case of construction and operation of a new CCR unit. Amendments made to the Plan will be documented in Appendix E. The amended Plan will be placed into the facility's operating record as described in Section 8.0.

8.0 RECORDKEEPING, NOTIFICATION and INTERNET REQUIREMENTS

8.1 Recordkeeping

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. Files may be maintained on a computer or storage system accessible by a computer. One recordkeeping system may be used for the CCR units if the system identifies each file by the name of each unit. The Plan (and any subsequent amendment of the plan) and the Annual Report will be kept in the facility's operating record as they become available. Only the most recent Plan must be maintained in the record.

[§ 257.105]

8.2 Notification

Texas CEQ will be notified within 30 days of when the Plan (or any subsequent amended Plan) or 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. [§ 257.106]

8.3 Internet Site Requirements

The most recent Plan and Annual Report will be placed on the facility's CCR website titled "CCR Rule Compliance Data and Information" within 30 days of placing them in the operating record. [§ 257.107]

Appendix A

40 CFR Part 257.80 Operating Criteria

§ 257.80 Air criteria.

(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

(b) *CCR fugitive dust control plan.*

The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.

(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. The owner or operator has completed the initial CCR fugitive

dust control plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(1).

(6) *Amendment of the plan.* The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

(c) *Annual CCR fugitive dust control report.* The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by § 257.105(g)(2).

(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g).

Appendix B

Appendix C



Pond 21

Pond 22

Wastewater and Sludge Pond

Pond 23

3430

Pond 6



2000 ft

Google earth

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Appendix D

