AEP GENERATION RESOURCES

CONESVILLE PLANT

FUGITIVE DUST CONTROL PLAN

Prepared By:

AEP Generation Resources, Inc.
Conesville Plant
47201 County Road 273
Conesville, Ohio 43811

and

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

Revision 3 – October 2018

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Appendices

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 A. MILLER

Printed Name of Registered Professional Engineer

David A. Miller

Signature

E-60659	OHIO	10.25.18
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 on Conesville Plant'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 Ohio EPA air permits issued for the plant.

There is one CCR surface impoundment system and one CCR landfill located at Conesville Plant that is subject to the Plan. The impoundment is known as the Ash Pond System (APS) and is divided into distinct areas by splitter dikes. The Conesville Residual Waste Landfill (Landfill) receives: gypsum; FGD material; fly ash and bottom ash, which is periodically removed from the APS; and dry fly ash periodically removed from the ash silos. The Plan addresses the CCR units and the associated materials handling and roadways.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

General Information:

Name of Facility: AEP Generation Resources, Inc. – Conesville Plant
Street: 47201 County Road 273
City: Conesville State: Ohio ZIP Code: 43811
County: Coshocton
Latitude: 40º 11' 6" N Longitude: 81º 52' 47" W

2.2 Contact Information

Facility Operator:

Name: AEP Generation Resources – Conesville Plant
Attention: Ryan J. Forbes - Plant Manager
Address: 47201 County Road 273
City, State, Zip Code: Conesville, Ohio 43811

Facility Owner:
Name: Unit 4 - AEP Generation Resources, Inc./DP&L
Units 5 and 6 – AEP Generation Resources, Inc.
Attention: Scott Weaver – AEP Generation Resources, Inc. - Director, AQS
Address: 1 Riverside Plaza
City, State, Zip Code: Columbus, Ohio 43215

Plan Contact:
Name: Beth A. Mullen – Conesville Plant Environmental Coordinator
Address: 47201 County Road 273
City, State, Zip Code: Conesville, Ohio 43811
Telephone number: 740-829-4094
Email address: bamullen2@aepes.com

2.3 Activities at the Facility

The Conesville Plant is located on the east shore of the Muskingum River at river mile marker 104.7 in Coshocton County, Conesville, Ohio. The plant consists of six units, of which units 1, 2, and 3 are permanently retired. Unit 4 is a coal-fired, 820 MWg nominally rated steam electric generating unit jointly owned by AEP Generation Resources, Inc. and Dayton Power and Light, and is operated by AEP Generation Resources, Inc. Units 5 and 6 are coal-fired, steam electric generating units; each nominally rated at 425 MWg and are wholly owned and operated by AEP Generation Resources, Inc.

The Conesville Plant generating units are equipped with electrostatic precipitators (ESPs) that capture fly ash particles entrained in the combustion gases. The fly ash particles collect in hoppers at the base of the ESPs and are either conveyed with water via piping to the plant's ash pond, or pneumatically conveyed by pipeline to dry storage silos.

Units 4, 5 and 6 are dry bottom "type" boilers that produce a conventional bottom ash product. This material is conveyed (sluiced) with water through pipelines to the plant's bottom ash pond.

The plant's Ash Pond System (APS) is divided into distinct areas by splitter dikes. The largest area of the APS is referred to as the ash pond, which consists of five ponds divided by internal dikes. This portion of the APS receives fly ash and bottom ash sluice water. These internal dikes facilitate the re-routing of fly ash and bottom ash sluice water during times when maintenance dredging is required. During most years, fly ash is excavated from the pond and transported by truck to

the Residual Waste Landfill (Landfill). Bottom ash may also be excavated and excess material that is not beneficially used is periodically placed in the Landfill. Bottom ash may also be used on temporary access roads on the surface of the active Landfill phase.

The remaining area of the APS is the clear water pond. The clear water pond receives the effluent from the ash pond area and is subsequently conveyed to the plant's reclaim pond. These are considered deminimus sources of air emissions and no further discussion is included in the Plan.

The fly ash silos are equipped with an ash conditioning and truck load-out system. The conditioning system adds water to the ash to minimize fugitive dust emissions during loading, transport, unloading and placement of the ash in the landfill. Dry fly ash may also be loaded into enclosed trucks for beneficial use. The fly ash stored in silos can be incorporated into the FGD mix, directly hauled to the Landfill, or beneficially used.

The Conesville generating units are equipped with flue gas desulfurization (FGD) systems. The Unit 5 and 6 systems use pulverized reagent lime slurry which is sprayed into the combustion gases downstream of the ESPs. The slurry reacts with sulfur compounds in the combustion gases producing calcium sulfite sludge. The sludge is conveyed by piping to thickener tanks for initial de-watering. The thickener underflow is sent to a surge tank that feeds three vacuum filters where further de-watering occurs. The filter cake from the vacuum filters is conveyed to pug mills where fly ash and lime are added to produce a stabilized FGD material. The FGD material is stockpiled at a storage pad for a period to allow the material to cure. Upon curing, the material is excavated from the pile and loaded into trucks for delivery to the landfill or for beneficial use.

The Unit 4 gypsum material is a moist byproduct of the Unit 4 limestone FGD process. Pulverized reagent slurry is fed into the scrubber absorber where it reacts with the flue gas. The byproduct solids formed in the absorber's reaction tank consist primarily of calcium sulfate (i.e., gypsum). The gypsum slurry consisting of 20 to 25 percent solids (by weight) is discharged to a dewatering system consisting of a hydrocyclone and vacuum belt filters. Conveyor systems are used to transfer the dewatered gypsum to a stockpile at the plant site. From the stockpile area, gypsum is loaded into trucks for disposal at the landfill or for beneficial use.

2.4 General Site Map

A topographic map for the Conesville Plant is included in Appendix B. The map is marked-up to depict the general locations of the plant site, APS, gypsum stockpile, FGD material stockpile, dry fly ash facility, and Landfill.

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 Paved and Unpaved Roadways

3.1.1 Overview

Trucks are used to transport CCR from the plant site to the Landfill over paved plant roadways, a paved dedicated haul road and paved and unpaved roadways within the Landfill. Gypsum is hauled from the plant stockpile over approximately 3.5 miles of paved roadways to the Landfill entrance and FGD material is hauled from the plant over approximately 1.5 miles of paved roadways to the Landfill entrance. Bottom ash and Fly ash are hauled from the APS area over approximately 2 miles of paved roadways to the Landfill entrance. Within the Landfill, trucks travel approximately 0.1 miles over paved roadways to the disposal area, followed by a much shorter unpaved roadway that varies with the location of the active fill area. The applicable and adequate fugitive dust control measures were primarily selected in accordance with the measures contained in the Conesville Plant Title V permit and Conesville Landfill solid waste permit. Two public roads are crossed on the truck route to the Landfill and these crossings are addressed as needed to minimize fugitive dust due to trucking activity.

3.1.2 Landfill and Plant Roadways

The appropriate and applicable fugitive dust control measures for roadways are watering and speed controls. Water trucks are used as needed based upon daily observations and recordkeeping to minimize or eliminate emissions of fugitive dust generated by CCR truck traffic. Speed limits are posted for paved and unpaved roads at the plant and Landfill. Any material carried off plant property and deposited onto public highways by vehicular traffic or erosion by water is promptly removed and disposed of properly to minimize or prevent resuspension. These control measures for Landfill haul roads which are taken from the Conesville Title V permit and Conesville Landfill permit are also applicable and adequate for the plant roadways used for transporting CCR. Truck washes are located at the Landfill and Plant FGD material load-out area. The washes are used as needed, when conditions allow, 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 Landfill

3.2.1 Overview

The landfill receives gypsum, FGD material, fly ash, and bottom ash from the Conesville Plant. These materials contain sufficient moisture (conditioned) that little or no fugitive dust is generated during loading and unloading operations. The control measures selected for the roadways located within the Landfill are provided above. The applicable and adequate fugitive dust control measures selected for CCR handling at the Landfill are discussed below and were primarily selected in accordance with the measures contained in the Conesville Landfill solid waste permit. [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

Gypsum, FGD material, fly ash and bottom ash is unloaded from trucks in the active fill area of an open landfill cell, where a bulldozer or similar equipment will spread and compact the materials. A roller may also be used for compaction. These materials contain sufficient moisture that little or no fugitive dust is generated. The fugitive dust control measures selected for truck unloading include maintaining moisture in the material, taking precautionary measures (minimize drop height) and watering if necessary. The measures selected for spreading and compacting include maintaining vehicle speed, maintaining moisture in the material, and watering if necessary.

3.2.3 Wind Erosion

Generally, landfill disposal areas can be classified as closed or open. Closed areas have received final cover and vegetation has been established. Open areas contain both the active fill area and areas that have been 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; maintaining moisture content of the materials, and watering if necessary.

3.3 Fly Ash

Although all units have been converted to use dry fly ash handling, the ash pond is used as a backup for the wet handling systems. It is subdivided by a series of internal dikes which facilitate the re-routing of fly ash sluice water during times when maintenance dredging is required. Fly ash is excavated from the pond and transported by truck to the Landfill, if not beneficially used. Due to the wet

condition of the ash and location of the pond surface below the surrounding area, the pond has no fugitive emissions. Fly ash that is removed from the pond is not stockpiled but loaded onto trucks for disposal or beneficial use and therefore loading and stockpiling create essentially no fugitive emissions. A review of potential control measures concluded that the applicable and appropriate options consist of maintaining moisture of the material, timely loading of trucks from the pond, and watering if necessary. Enclosures, compaction and daily cover are not applicable given the size of the area and characteristics of the material.

3.4 Bottom Ash

Bottom ash is routinely excavated and excess material that is not sold or otherwise beneficially used is loaded into trucks and placed in the Landfill. Due to the wet condition of the ash, location of the pond surface below the surrounding area the pond has no fugitive emissions. Bottom ash is periodically dredged from the pond and placed adjacent to the pond where it gradually dewaters. The ash is then loaded onto trucks for transport. The bottom ash remains wet until it is loaded onto trucks in a timely manner thus minimizing fugitive emissions. A review of potential control measures concluded that the applicable and appropriate options consist of maintaining moisture of the material, timely loading of trucks from the stockpile, and watering if necessary. Enclosures, compaction and daily cover are not applicable given the size of the area and characteristics of the material.

3.5 Dry Fly Ash Handling

The Conesville Plant units use dry fly ash handling systems. Fly ash is pneumatically transported from the electrostatic precipitator hoppers to silos to eventually be transported for use in the Sludge Treatment Process (STP) or loaded onto trucks. Ash is transferred by hoppers and screw conveyors and is then combined with lime and Unit 5 and 6 scrubber sludge as part of the sludge treatment process. Fly ash may also be transferred to the truck load-out building to be conditioned with water and loaded into trucks for disposal at the landfill or beneficial use. The dry fly ash systems are subject to Ohio EPA PTI No. P0121093. The permit specifies the applicable and appropriate fugitive dust control measures for the site to minimize or eliminate fugitive emissions. The control measures include: full enclosures, bin vent filters, baghouse and water spray curtains.

3.6 Gypsum Transfer and Stockpile

Conesville Plant Unit 4 gypsum is dewatered and transferred by conveyors to the gypsum storage pile where it is loaded onto trucks for disposal at the landfill. These activities are subject to Ohio EPA Air Permit to Install (PTI) No. 06-08121. The permit application specifies the applicable and appropriate fugitive dust control measures for the site to minimize or eliminate fugitive emissions. The control measures include: wetness of the gypsum; enclosed conveyors and transfers; minimize drop height from stacker to pile; and precautionary measures for pile. The gypsum is loaded into trucks and dust is controlled due to the moisture of the material and by minimizing the drop height.

3.7 FGD Material Transfer and Stockpile

The Unit 5 and 6 FGD material is dewatered and stabilized at the Conesville Plant site. The filter cake from the vacuum filters is conveyed to pug mills where fly ash and lime are added to produce a stabilized FGD material. The FGD material is stockpiled at a storage pad for a period to allow the material to cure. Upon curing, the material is excavated from the pile and loaded into trucks for delivery to the landfill. Due to the high moisture content of this material**,** the fugitive emissions from the storage and loading are deminimus and fugitive dust controls are unwarranted.

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. The Landfill, APS, dry fly ash handling, gypsum transfer and stockpile, FGD material transfer and stockpile, and associated paved and unpaved roadways are inspected on a daily 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 review the inspection records when preparing the Annual Report (see Section 6.0 below) to 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 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 Ohio EPA 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 possible, the PEC will follow-up with the complainant and/or Ohio EPA 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 C. 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 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 APS and Landfill if the system identifies each file by the name of each unit (i.e. APS or Landfill). 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

The Director of the Ohio EPA and Ohio EPA-SEDO 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.

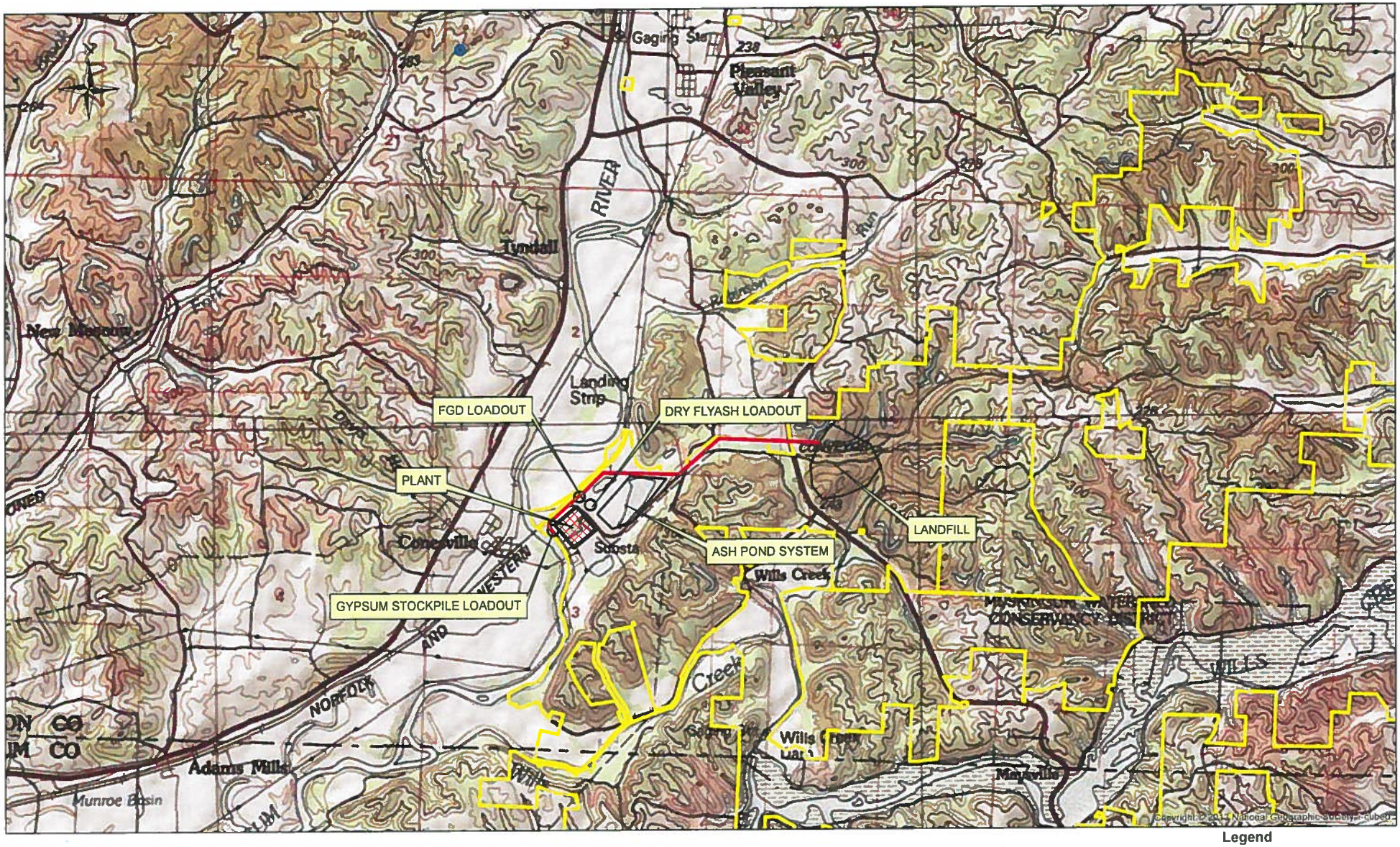
(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

(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

CONESVILLE PLANT



Appendix C

Record of Plan Revisions		
Revision Number	Date	Revision Description
0	9/8/2015	Initial Plan
1	4/12/2017	Update Plant Manager; Clarify use of truck washes
2	3/15/18	Update owners name, contact name, pond descriptions, permit number, FGD description, TOC
3	10/15/18	Removed statement that plan is kept in facility records in sections 1 and 8.1