

Southwestern Electric Power Company

WELSH POWER PLANT



CCR FUGITIVE DUST CONTROL PLAN

for

Bottom Ash Storage Pond

Primary Bottom Ash Pond

Landfill

Prepared By:

Southwestern Electric Power Company

Welsh Power Plant

1187 CR 4865

Pittsburg, Texas 75686 and

American Electric Power Service Corporation

Environmental Services

1 Riverside Plaza – Floor 17

Columbus, Ohio

43215

Revision 0 – October 2015

Revision 6 – February 2025

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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

02.07.2025

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 coal combustion residual (CCR) from becoming airborne at the facility. The Plan and subsequent amendments will be placed in the operating record and retained in the office of the Welsh Power Plant Environmental Coordinator (PEC). The Plan and subsequent amendments will also be placed on Welsh Power 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 Texas EPA air permits issued for the plant.

There are two CCR surface impoundments and one CCR landfill located at Welsh Power Plant that are subject to the plan. The Plan addresses these CCR locations and the associated paved and unpaved roadways.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

Facility Information

Name of Facility: Southwestern Electric Power Company – Welsh Power Plant

Street: 1187 CR 4865

City: Pittsburg

State: TX ZIP Code: 75686

County: Titus

Latitude: 33° 3' 10.4" Longitude: - 94° 50' 57.0"

2.2 Contact Information

Facility Operator:

Name: Southwestern Electric Power Company – Welsh Power Plant

Attention: Andrew Brannan - Plant Manager

Address: 1187 CR 4865

City, State, Zip Code: Pittsburg, TX 75686

Facility Owner:

Name: Southwestern Electric Power Company
Attention: Jill Lukehart – AEP Manager, Air Quality Services
Address: 1 Riverside Plaza, Floor 17
City, State, Zip Code: Columbus, OH 43215

Plan Contact:

Name: Derrick Taylor – Welsh Power Plant Environmental Coordinator
Address: 1187 CR 4865
City, State, Zip Code: Pittsburg, TX 75686
Telephone number: 903-855-5444
Email address: drtaylor2@aep.com

2.3 Activities at the Facility

Southwestern Electric Power Company (SWEPCO), a unit of American Electric Power (AEP), is operating a coal-fired electric power generating facility near Pittsburg, Texas, in Titus County. This facility is named the Welsh Power Plant. The plant consists of two electric generating unit boilers fueled by PRB coal.

2.4 Site Maps

A site location map for the Plant units is included as Figure 2-1 in Appendix C. Appendix B contains a site location map for the Landfill (Figure 1-1).

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 *Paved and Unpaved Roadways*

3.1.1 *Overview*

Trucks are used to transport CCR to the Landfill from the plant site. The trucks travel over private roadways to the landfill entrance. From the ash silo, the trucks travel approximately 1.2 miles over landfill improved roadways to the disposal area. The applicable and adequate fugitive dust control measures were primarily selected in accordance with the measures contained in Texas Operating Air Permit for the landfill roads and for the plant roads. The roadways are also subject to visible emission limits as contained in the air permits.

3.1.2 *Landfill and Plant Roadways*

The primary appropriate and applicable fugitive dust control measures for roadways are watering, tarping, and speed controls. Water trucks are used as needed based upon weekly inspections and other observations to minimize or eliminate fugitive dust. Chemical suppressants or stabilizers may also be used on unpaved roadways depending on specific site conditions. Posted speed limits are 15 mph for paved and unpaved roads. 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 Welsh ash landfill receives fly ash and bottom ash. Both materials contain moisture (conditioned) but water or chemical suppressants are added at the landfill as necessary to minimize fugitive dust emissions. The landfill activities are subject to the facility's Air Permits. The permit specifies 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 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. After compaction, fly ash is often reclaimed and sold as road base material. The fugitive dust control measures for truck unloading ash 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, 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; watering; and application of chemical suppressants. The bottom ash storage pile fugitive dust emissions are minimized by watering, application of chemical suppressants and pile height control.

3.3 Primary Bottom Ash Pond

Welsh Power Plant bottom ash and economizer ash are sluiced to the Primary Ash Pond where the deposition of solid matter occurs. Due to the wet condition of the ash and location of the pond surface below the dam and valley wall elevations, the ponds typically have no fugitive emissions. Pond levels may be adjusted to inundate any exposed dry areas and minimize dusting. The applicable and appropriate fugitive dust control measure is to adjust the pond water level, when practicable.

3.4 Bottom Ash Storage Pond

The Welsh Bottom Ash Storage Pond is a poly-lined pond that contains mostly bottom ash and economizer ash that has been dredged from the Primary Bottom Ash Pond. Fly ash is also present at far lesser amounts. Ash is routinely reclaimed from the Bottom Ash Storage Pond for beneficial reuse. Water or chemical dust suppressant is applied to the pile to minimize fugitive emissions. The pond does not currently contain water as is undergoing closure according to a Professional Engineer certified closure plan.

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 and associated paved and unpaved roadways are inspected on a weekly basis. The purpose of the inspections is to determine if the control measures for the CCR unit as described above are being implemented as necessary to minimize or eliminate fugitive emissions. Records of inspections will be maintained on the 7-day CCR inspection form in Enviance. The PEC will review the inspection records annually 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 TCEQ who in turn will contact the PEC.

5.2 Follow-up

All complaints will be entered into a record 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 TCEQ 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 by including 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. 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

TCEQ 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.

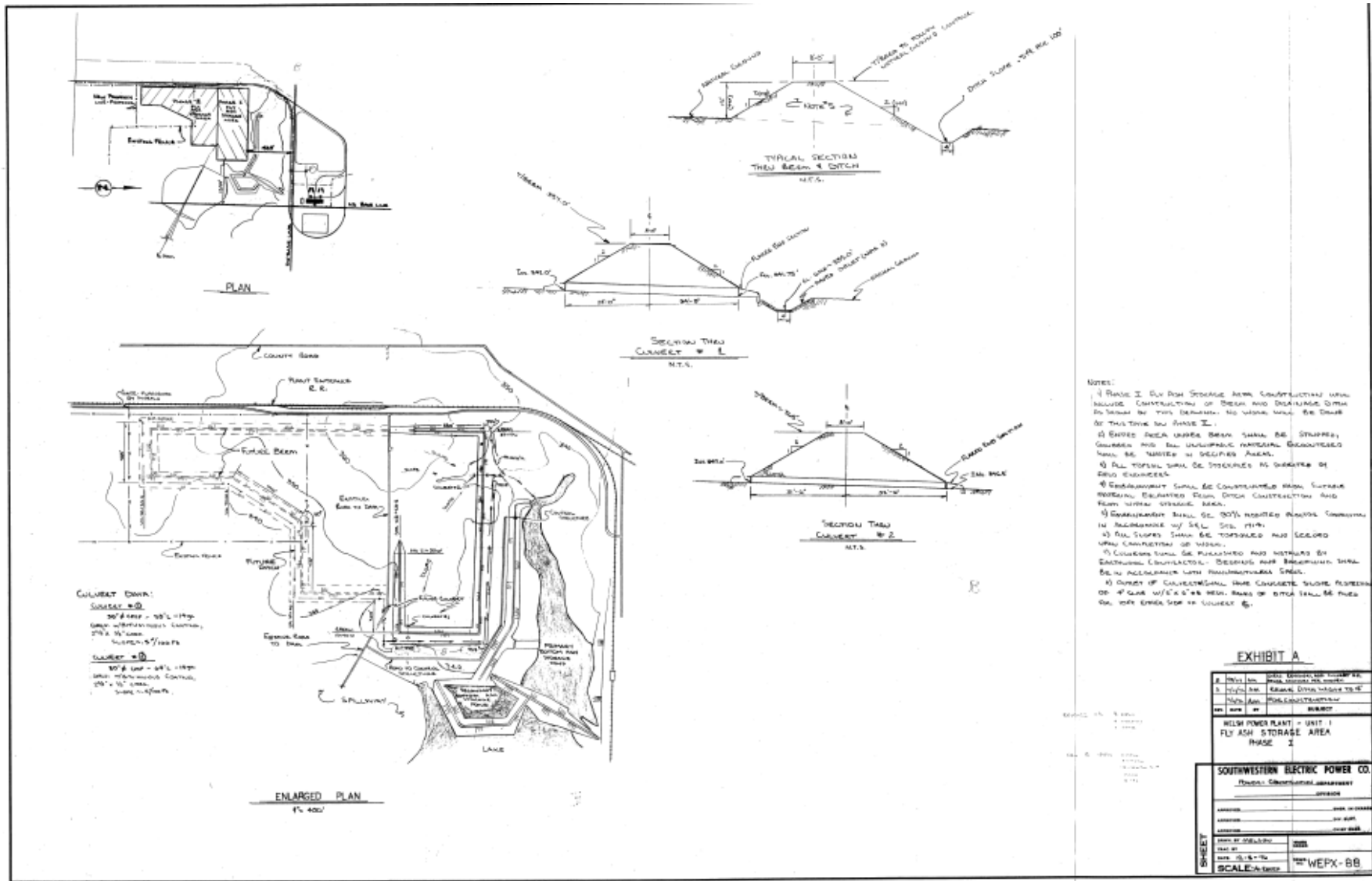
(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

(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).

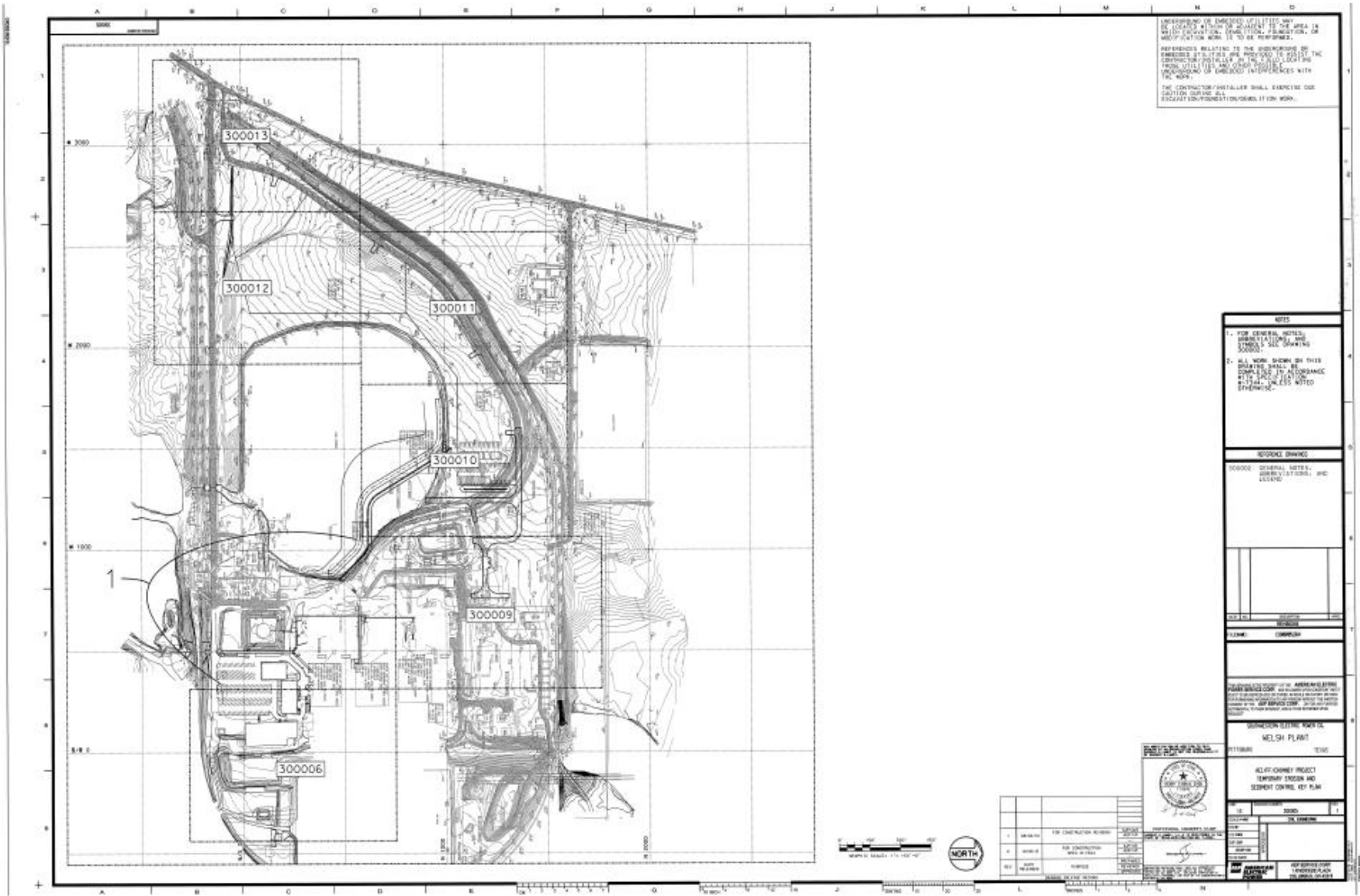
Appendix B

CCR Fugitive Dust Control Plan - rev 6
Welsh Power Plant



Appendix C

CCR Fugitive Dust Control Plan - rev 6
Welsh Power Plant



UNDEVELOPED OR UNBUILT AREAS MAY BE LOCATED WITHIN OR ADJACENT TO THE AREA IN WHICH EXCAVATION, FOUNDATION, FOUNDATION, OR REPAIR WORK IS TO BE PERFORMED.

REFERENCES RELATING TO THE SUBMISSIONS BY EMPLOYEES AT THE SITE ARE PROVIDED TO ASSIST THE CONTRACTOR/INSTALLER IN THE IDENTIFICATION OF THE LOCATION OF THE WORK. THE CONTRACTOR/INSTALLER SHALL EXERCISE DUE DILIGENCE TO IDENTIFY ALL SUCH AREAS AND TAKE APPROPRIATE PRECAUTIONS TO AVOID DAMAGE TO SUCH AREAS.

- NOTES**
- FOR GENERAL NOTES, REFER TO THE GENERAL NOTES AND SPECIFICATIONS.
 - ALL WORK SHOWN ON THIS DRAWING SHALL BE COMPLETED IN ACCORDANCE WITH THE SPECIFICATIONS AND NOTES UNLESS NOTED OTHERWISE.

REVISIONS

REVISION GENERAL NOTES, OBSERVATIONS, AND LETTERS

NO.	DATE	DESCRIPTION

PROJECT INFORMATION

PROJECT NO. 11111111
PROJECT NAME: WELSH POWER PLANT

DESIGNER INFORMATION

DESIGNER: [Company Name]
DATE: [Date]

CLIENT INFORMATION

CLIENT: [Company Name]
PROJECT: WELSH POWER PLANT

NO.	DATE	DESCRIPTION

NO.	DATE	DESCRIPTION



Appendix D

