

OHIO FRANKLIN REALTY

PHILO SITE



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

American Electric Power Service Corporation
Environmental Services
1 Riverside Plaza, 17
Columbus, OH 43215

September 2025
Initial Report

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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 October 1, 2024 to September 30, 2025. The Annual Report is deemed complete when it is placed in the facility's operating record as described in Section 6.0. The initial Annual Report will be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the site's operating record. 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. The Annual Report will also be placed on the Philo Site's publicly accessible internet website titled "CCR Rule Compliance Data and Information" as described in Section 6.0.

2.0 SITE DESCRIPTION AND CONTACT INFORMATION

2.1 Site Information

Site Information

Name of Facility: Philo Site

Street: Intersection of Bridge St and Circular St., Philo, OH 43771.

City: Philo State: OH ZIP Code: 43771

County: Muskingum

Latitude: 39° 51' 50" N Longitude: 81° 54' 17" W

2.2 Contact Information

Site Owner & Operator:

Name: Ohio Franklin Realty LLC

Attention: Gary Spitznogle

Address: 1 Riverside Plaza, 17

City, State, Zip Code: Columbus, OH 43215

Site Contact:

Name: David Miller

Address: 1 Riverside Plaza, 17

City, State, Zip Code: Columbus, OH 43215

Telephone number: 614-716-2281
Email address: damiller@aep.com

2.3 Activities at the Site

The Philo Plant began operation on October 14, 1924. It's peak generating capacity was 495-MW. The plant operated until May 31, 1975, and was officially retired in 1979. The plant and associated structures were demolished in 1983.

The plant utilized a bottom ash pond complex and a fly ash pond for managing its CCR. The bottom ash pond complex was approximately 2.6 acres. The fly ash pond was approximately 30 acres. Closure of the site was completed under applicable state regulations at the time in 1990. Current site activities include the removal of trees and grinding stumps to ground level, clearing surface vegetation, minor contouring to eliminate uneven surfaces, and establishing interior and exterior roads for improved access. These efforts aim to create a surface that facilitates easier mowing and inspection.

3.0 FUGITIVE DUST CONTROL SELECTION

The following fugitive dust control measures were implemented during the period addressed by this Annual Report:

Site Activity	Fugitive Dust Control Measures
Waste Unloading and Placement of Material	There are currently no CCR unloading or placement activities at this site. The plan and applicable fugitive dust control measures will be amended if conditions change.
Wind erosion	Wind erosion control measures for open areas included: inspection of vegetative cover, watering as needed, application of hydroseed for dust control and temporary soil stabilization, and a topsoil substitute, biotic soil medium, and hydroseed for dust control and long-term stabilization.

4.0 CITIZEN COMPLAINT LOG

4.1 Report Contacts

Complaints made to the company will be received by the Site Owner.

No complaints were received by the Site Owner during the period addressed by this Annual Report.

4.2 Follow-up

All complaints will be entered into a log by the Site Owner with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be investigated by the Site Owner: inspection of the dust source, checking site activities at the time of the event, reviewing inspection records, reviewing weather data, and/or contacting the person making the complaint to obtain additional information as required.

No complaint follow-up was necessary during the period addressed by this Annual Report.

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 investigation, it will be amended accordingly. If possible, the Site Owner will follow up with the complainant and/or Ohio EPA to explain the findings of the complaint investigation and corrective actions. Citizen complaints will be recorded in the Annual Report.

No corrective actions due to complaints were necessary during the period addressed by this Annual Report.

5.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended.

The Site Owner 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, subsequent amendments of the plan (required by 257.80(b)), and documentation of all related information will be maintained in the operating record for 5 years after the site completes post-closure care or closure by removal (CBR) (40 C.F.R. §257.105(g)(1)) for the

last CCR unit at the site. Files may be maintained on a computer or storage system accessible by a computer. The Plan (and any subsequent amendments of the plan) will be kept in the site's operating record as they become available. Only the most recent Annual Report and Plan must be maintained on the website. The Annual CCR Fugitive Dust Control Report will be placed in the site's operating record annually, based on the date of the previous report.

6.2 Notification

The Ohio EPA 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 by 5:00 PM. 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 site's CCR website titled "CCR Rule Compliance Data and Information" within 30 days of placing it in the operating record.

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