

SOUTHWESTERN ELECTRIC POWER COMPANY

H.W. PIRKEY POWER PLANT



FUGITIVE DUST CONTROL PLAN

for
East Bottom Ash Pond
West Bottom Ash Pond
FGD Stackout Area
Landfill

Prepared By:

Southwestern Electric Power Company
H.W. Pirkey Power Plant
2400 FM 3251
Hallsville, TX 75650

and

American Electric Power Service Corporation
Environmental Services
Environmental Services - Floor 24
1 Riverside Plaza Columbus OH 43215

Revision 0 – October 2015
Revision 6 – October 2025

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Appendices

Appendix A – 40 CFR Part 257.80 Air Criteria (Fed. Reg. May 8, 2024)

Appendix B – Property Boundary Aerial View Map

Appendix C – Aerial View Map of Ash Ponds, FGD Stackout Area and Landfill

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

10.03.2025

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 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 Pirkey Plant Environmental Coordinator (PEC). The Plan and subsequent amendments will also be placed on Pirkey 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 TCEQ air permits issued for the plant.

Pirkey has not burned coal since March 31st, 2023 and plans are completed or underway to close applicable CCR units and associated activities previously covered under this plan. Details about actions taken since March 31st are in Section 2.3.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

Facility Information

Name of Facility: H.W. Pirkey Power Plant

Street: 2400 FM 3251

City, State, ZIP Code: Hallsville, TX 75650

County: Harrison

Latitude: 32° 27'43" N Longitude: 94° 29' 07" W

2.2 Contact Information

Facility Operator:

Name: Southwestern Electric Power Company

Attention: Joel Endsley – Plant Manager

Address: 2400 FM 3251

City, State, Zip Code: Hallsville, TX 75650

Facility Owner:

Name: Southwestern Electric Power Company
Attention: Jill Lukehart – Environmental Manager
Address: Environmental Services – Floor 24
City, State, Zip Code: 1 Riverside Plaza Columbus OH 43215

Plan Contact:

Name: Derrick Taylor – Plant Environmental Coordinator (PEC)
Address: 2400 FM 3251
City, State, Zip Code: Hallsville, TX 75650
Telephone number: 903-927-5853
Email address: drtaylor2@aep.com

2.3 Activities at the Facility

Pirkey has not burned coal since March 31st, 2023. There were two CCR surface impoundments (east and west bottom ash ponds), one CCR pile called the FGD Stackout Area (FGDSA) where the scrubber sludge and flyash was stacked out before it was trucked to the onsite landfill, and one CCR landfill that received scrubber sludge, flyash, and bottom ash.

For the West Bottom Ash Pond (WBAP), East Bottom Ash Pond (EBAP), and FGDSA, all CCR has been removed and an additional 1 foot of the area has been excavated and revegetated. There is no longer CCR to manage at these units.

2.4 Site Maps

A Pirkey Plant property boundary aerial view map is included in Appendix B. Appendix C contains an aerial view that includes the landfill and former locations of the bottom ash ponds, and FGD Stackout area.

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 Paved and Unpaved Roadways

3.1.1 Overview

During closure activities, trucks were used to transport CCR to the Landfill from the FGD Stackout Area and Bottom Ash Ponds.

3.1.2 Landfill 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 on routine evaluations 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. Earth or other materials that may be deposited onto unpaved 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 FGD Stackout Area and Landfill

3.2.1 Overview

The FGD Stackout Area was a CCR pile where FGD/Flyash Sludge was stacked out or placed into the FGD Stackout Area using a conveyor system. The CCR material was then loaded and trucked to the Landfill. The FGD Stackout Area commenced closure activities on September 1, 2023 and there is no longer CCR to manage at this unit.

The Landfill received FGD/Flyash Sludge and bottom ash from the Pirkey Plant. Both materials contained moisture (conditioned) but water was added at the landfill as necessary to minimize fugitive dust emissions. [Note: “conditioned” CCR means the material has sufficient moisture content to prevent wind dispersal but will not result in free liquids]

3.2.2 Loading, Unloading and Placement

There are currently no loading, unloading or placement of CCR materials being conducted.

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 and watering.

3.3 Bottom Ash Ponds

Pirkey Plant bottom ash produced by the unit was wet sluiced to the East or West BAP during unit operations. The bottom ash was routinely reclaimed from the ponds, loaded into trucks and transported to the Landfill for storage. The WBAP commenced closure activities on March 30, 2022 and there is no longer CCR to manage at this unit. The EBAP commenced closure activities on April 25, 2023 and there is no longer CCR to manage at this unit.

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 remaining activities at the Landfill and associated unpaved roadways will be evaluated to determine if the control measures are being implemented as necessary to minimize or eliminate fugitive emissions. The PEC will continue to include the control measure evaluations during the annual assessment of the Plan and determine if additional or modified measures are warranted. No evaluations are 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 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 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 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 D. 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 BAPs, Stackout Area, and Landfill if the system identifies each file by the name of each unit (i.e. BAPs, Stackout Area 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

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 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 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 no later than 30 days 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.

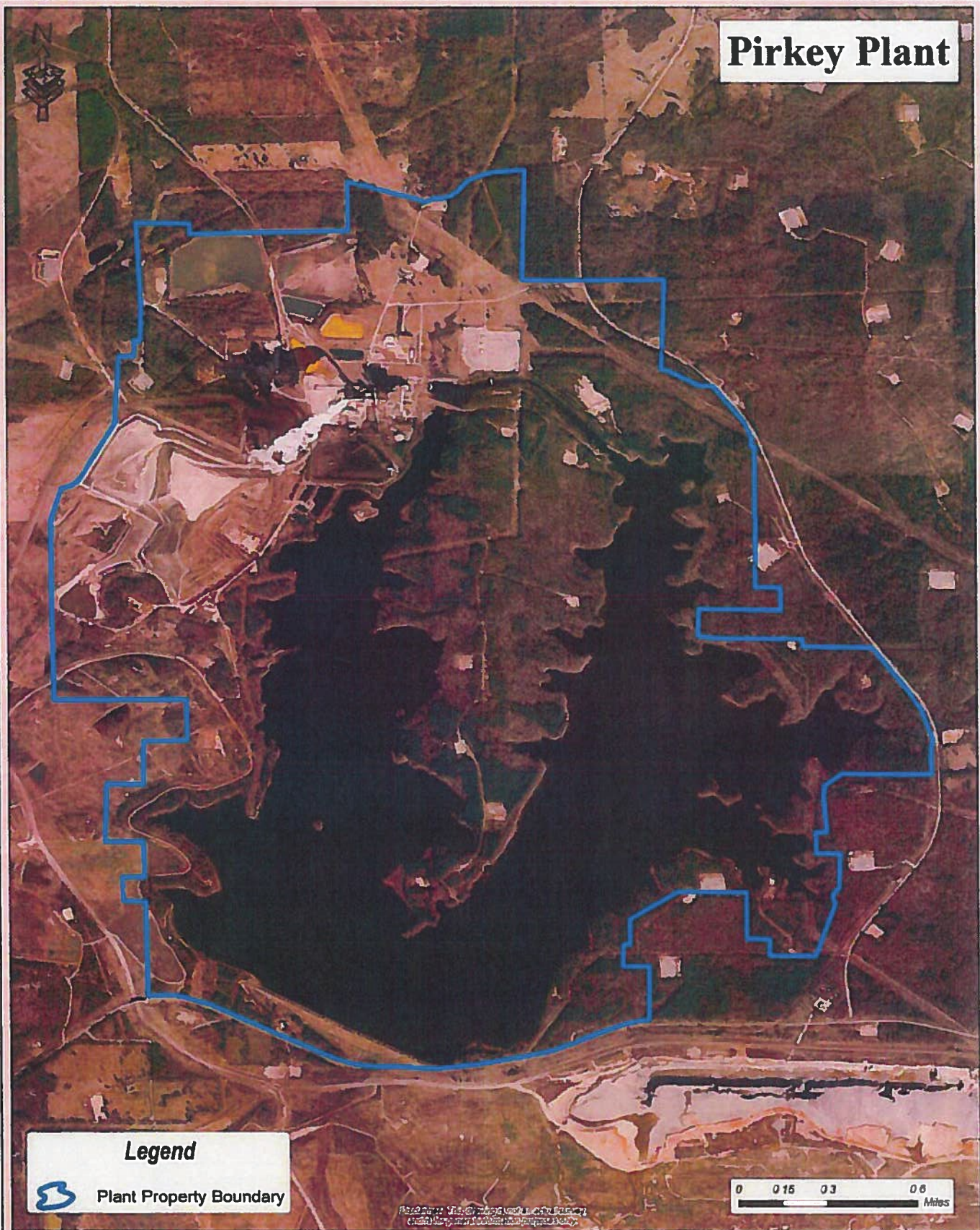
(7) The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements 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

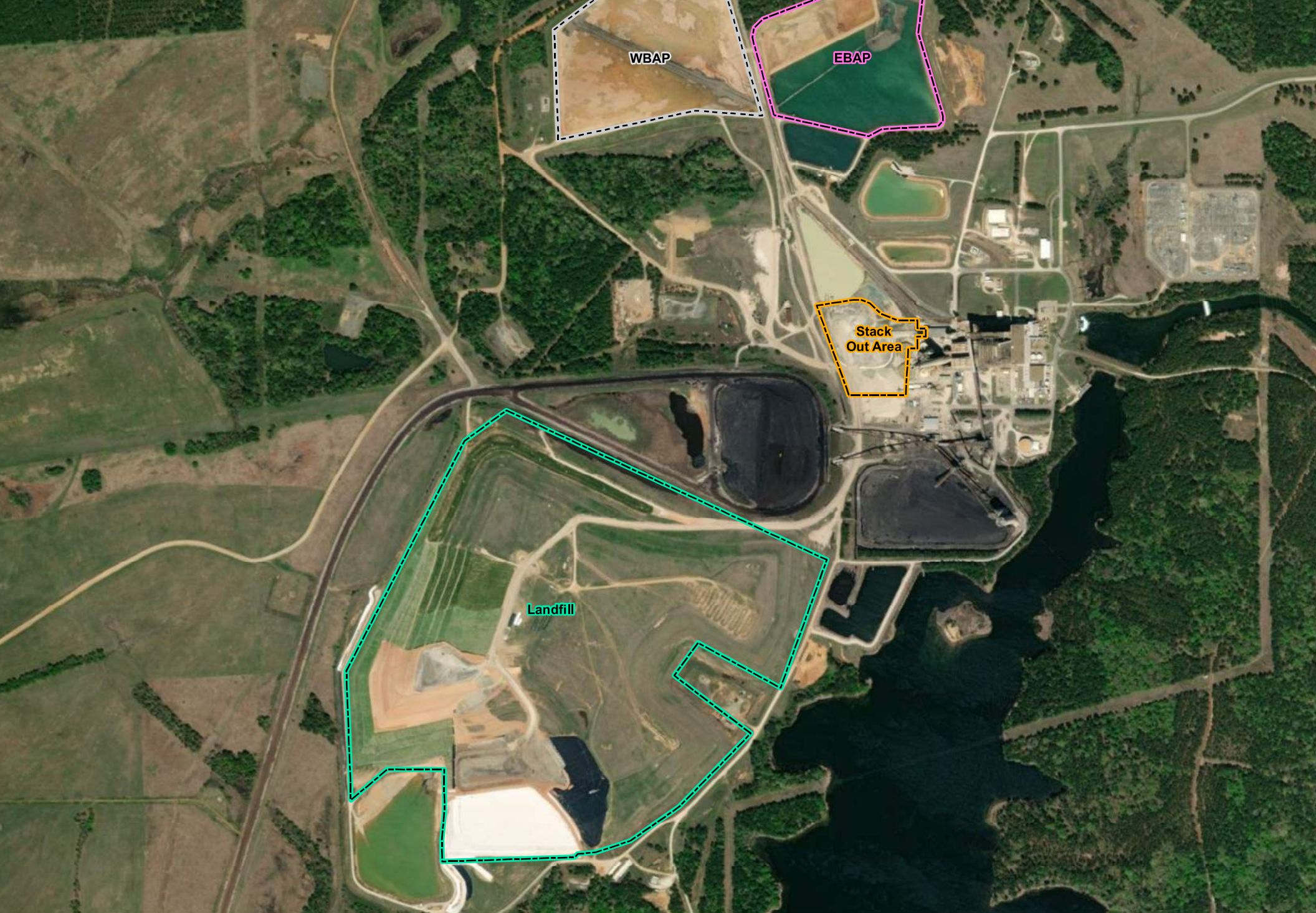
Pirkey Plant



March 8, 2010

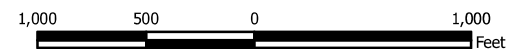
Cartography: AEP Real Estate Asset Management Dept.

Appendix C



Notes

1. Site features based on information available in CCR Groundwater Monitoring Well Network Evaluation Update (Arcadis 2022) provided by AEP.
2. The West Bottom Ash Pond CCR unit ceased receipt of waste and commenced closure by removal in March 2022. All removal activities were completed by July 2022.
3. AEP: American Electric Power



Appendix D

[illegible]