

OHIO FRANKLIN REALTY

POSTON SITE



FUGITIVE DUST CONTROL PLAN

Prepared By:

**American Electric Power Service Corporation
Environmental Services**

1 Riverside Plaza, 17
Columbus, OH 43215

**November 2024
Initial Plan**

**August 2025
Revision 1**

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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

08.01.2025

Registration No.

Registration State

Date

1.0 INTRODUCTION

The “Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments”, 89 Fed. Reg. 38950 (May 8, 2024) (amending 40 C.F.R. §257) requires owners and operators of inactive electric generating facilities to prepare documentation on the applicability of the rule for each legacy CCR surface impoundment at the facility. 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 good engineering practices to include measures that will effectively minimize CCR from becoming airborne at the site. The Plan and subsequent amendments will be placed in the operating record and placed on the site’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. The amendment must be made within 30 days of the change in conditions.

There is one Legacy CCR surface impoundment at the Poston site subject to the Plan. The surface impoundment is the “Ash Pond”. The Fugitive Dust Control Plan addresses this Legacy CCR surface impoundment and the associated paved and unpaved roadways.

2.0 SITE DESCRIPTION AND CONTACT INFORMATION

2.1 Site Information

Site Information

Name of Facility: Poston Site

Street: Intersection of Poston Rd. and Industrial Dr.

City: Athens State: OH ZIP Code: 45701

County: Athens

Latitude: 39° 22' 54" N Longitude: 82° 10' 48" 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 Poston Site is an inactive electric generating facility that began operation on October 22, 1949. It consisted of four generating units, totaling 220-MW. The plant operated until October 30, 1987. The plant and associated structures were demolished between March 1988 and July 1990.

The plant utilized an ash pond for managing its CCR ash. The original Ash Pond was approximately 24 acres. The Ash Pond was closed under the applicable state regulations, at the time, in 1988. 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.

2.4 Site Maps

A topographic site plan for the site is included in Appendix B and shows the Legacy CCR surface impoundment('s) and surrounding topography. An aerial view of the site and the associated Legacy CCR surface impoundment('s) is included in Appendix C.

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 Paved and Unpaved Roadways

There are currently no CCR hauling/transport activities at this site. To minimize or eliminate fugitive dust from roadway traffic during tree and surface vegetation removal and grass re-establishment, water trucks will be deployed as necessary based on daily inspections and observations. If conditions change, the plan and applicable fugitive dust control measures will be amended.

3.2 Ash Pond

3.2.1 Overview

The Ash Pond is no longer receiving CCR material. The Ash Pond received CCR ash from the Poston Electric Generating Plant from 1949 through 1987. The Ash Pond Site was closed in November 1988 and received a final cover and vegetation. The Ash Pond was closed under the applicable state regulations, at the time, in 1988. The Legacy CCR identification number is No. 06-2152.

3.2.2 Waste Unloading and Placement

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.

3.2.3 Wind Erosion

The Ash Pond has been closed with a final cover and is vegetated. To facilitate easier mowing and inspection, current activities at the site include tree removal, grinding stumps to ground level, clearing surface vegetation, and minor contouring to eliminate uneven surfaces. During these clearing and grading operations, water trucks will be utilized as needed, based on daily inspections and observations. As stumps are ground and vegetation mulched, hydroseed will be applied as necessary for dust control and temporary stabilization. Once clearing and contouring are complete, a topsoil substitute, biotic soil medium, and hydroseed will be applied as necessary, across the site, for dust control and long-term stabilization. Upon achieving long-term stabilization, periodic inspections of the vegetative cover will be conducted to ensure its integrity. If compromised, repairs will be made to the vegetative cover to prevent fugitive dust emissions.

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 Ash Pond is routinely evaluated to determine if the control measures described above are being implemented as necessary to minimize fugitive emissions. The Site Owner will include the control measure evaluations during the annual assessment of the Plan and determine if additional or modified measures are warranted.

5.0 CITIZEN COMPLAINT LOG

5.1 Site Contacts

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

5.2 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.

5.3 Corrective Actions 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.

6.0 ANNUAL REPORT

The Annual CCR fugitive dust control report (Annual Report) will include the following components: a 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 site'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 site'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 the construction and operation of a new CCR unit or the closure of an existing unit. The Plan must be amended within 30 days of the change in condition. Amendments made to the Plan will be documented in Appendix D. The amended Plan will be placed into the site's operating record as described in Section 8.0.

8.0 RECORDKEEPING, NOTIFICATION, and INTERNET REQUIREMENTS

8.1 Recordkeeping

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 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.

8.2 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.

8.3 Internet Site Requirements

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

Appendix A – 40 CFR Part 257.80 Air Criteria

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 site, 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 site. 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 site.

(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 site no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the site 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 site'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 site'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 that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

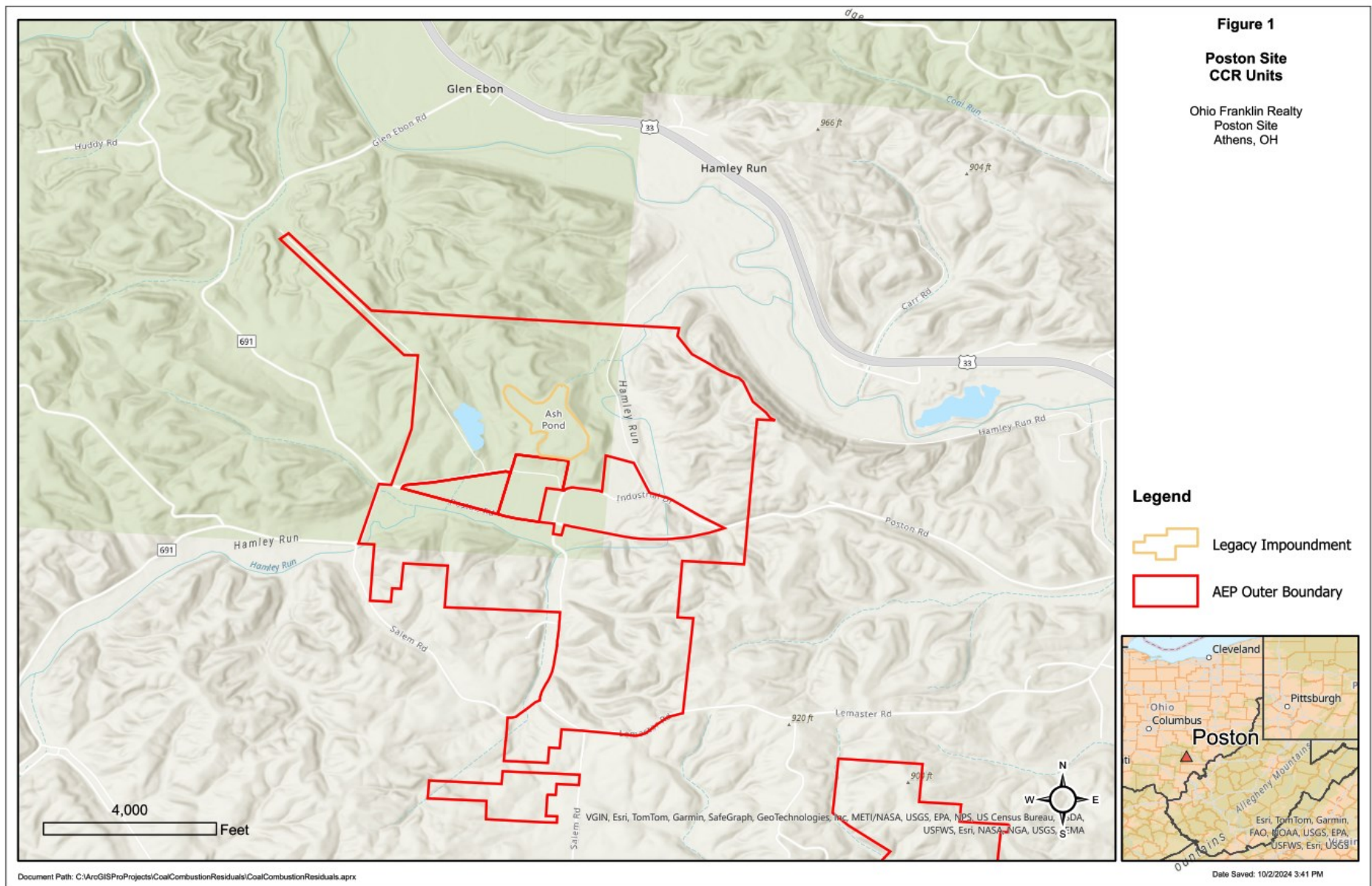
(c) *Annual CCR fugitive dust control report.*

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

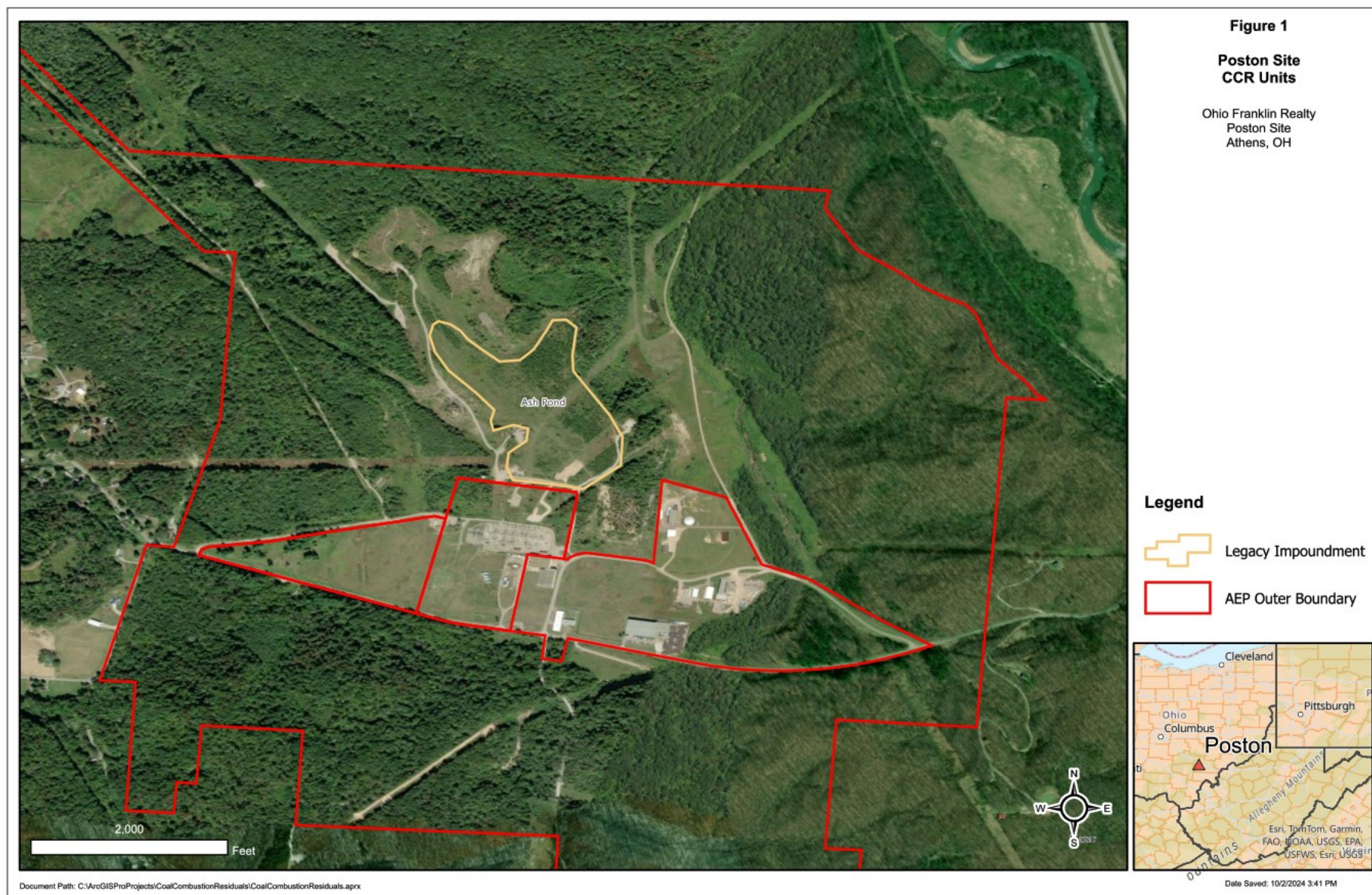
initial CCR fugitive dust control plan in the site's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the site'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 – Topographic Site Location Map



Appendix C – Site Aerial View



Appendix D – Plan Modification Documentation

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