

OHIO POWER COMPANY FRANKLIN REAL ESTATE COMPANY

KAMMER 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

July 2026
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 Anthony Miller

Printed Name of Registered Professional Engineer



David Anthony Miller

Signature

22663

West Virginia

07.24.2026

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 are two Legacy CCR surface impoundment at the Kammer site subject to the Plan. The surface impoundments are the “Ash Pond” and the “Boiler Slag Pond”. The Fugitive Dust Control Plan addresses these Legacy CCR surface impoundments and the associated paved and unpaved roadways.

2.0 SITE DESCRIPTION AND CONTACT INFORMATION

2.1 Site Information

Site Information

Name of Facility: Kammer Site

Street: 7897 Energy Road

City: Moundsville State: WV ZIP Code: 26041

County: Marshall

Latitude: 39° 50' 45" N Longitude: 80° 49' 10" W

2.2 Contact Information

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 Kammer Site is an inactive electric generating facility that began operation in 1958. The first two 210-MW generating units went into service in 1958, and a third 210-MW unit in 1959. The plant was retired in 2015 and demolished shortly thereafter.

There are two Legacy CCR surface impoundments identified at the Kammer site subject to the Plan, the “Ash Pond” and the “Boiler Slag Pond”.

2.4 Site Maps

A topographic site plan for the site is included in Appendix B and shows the Legacy CCR surface impoundments and surrounding topography. An aerial view of the site and the associated Legacy CCR surface impoundments are 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. 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 previously received CCR ash from the Kammer Electric Generating Plant from 1958 through 2015. The Ash Pond is approximately 20 acres in size and is open water.

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 is currently open water. The fugitive dust control measure will be to periodically inspect the Ash Pond for fugitive dust. If fugitive dust issues occur, control measures will be taken.

3.3 Boiler Slag Pond

3.3.1 Overview

The Boiler Slag Pond is no longer receiving CCR material. The Boiler Slag Pond previously received CCR ash from the Kammer Electric Generating Plant from 1958 through 2015. The Boiler Slag Pond is approximately 2 acres in size. The Boiler Slag Pond was closed under the applicable state regulations, at the time, in 2017.

3.3.2 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.

3.3.3 Wind Erosion

The Boiler Slag Pond was closed under the applicable state regulations, at the time, in 2017. The fugitive dust control measure will be to periodically inspect the cover to ensure its integrity. If the integrity is compromised, the cover will be repaired 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 and Boiler Slag Pond are routinely evaluated to determine if the control measures described above are being implemented as necessary to minimize fugitive emissions. Fugitive dust control measures will be evaluated annually during the annual assessment of the Plan to 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 Contact.

5.2 Follow-up

All complaints will be entered into a log by the Site Contact with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be investigated by the Site Contact: 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 Contact will follow up with the complainant and/or West Virginia Department of Environmental Protection (WVDEP) 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 was completed within 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 Annual Report.

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 including 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 West Virginia Department of Environmental Protection (WVDEP) 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" means the notification must be postmarked or sent by e-mail by 5:00 PM on that day. 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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