OHIO FRANKLIN REALTY

PHILO SITE

FUGITIVE DUST CONTROL PLAN

Prepared By:

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

November 2024
Initial Plan

October 2026
Revision 3

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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





Signature

E-60659	**Ohio**	**10.26.2026**
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 Coal Combustion Residuals (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 Compliance at Philo.” 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 impoundments at the Philo site subject to the Plan. The surface impoundments are the “Bottom Ash Pond Complex” and the “Fly Ash 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: Philo Site

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

City: Philo State: OH ZIP Code: 43771

County: Muskingum

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

2.2 Contact Information

Site Contact:

Name: David A. Miller, Director – Ash Management Services
Address: 1 Riverside Plaza, 24
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. Its 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 the Bottom Ash Pond complex and the Fly Ash Pond for managing its CCR. The Bottom Ash Pond complex was approximately 6.2 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.

On October 5, 2026, emergency repair work started on the fly ash pond dike on the southern side of the pond. The dike is made of bottom ash. During the repair, bottom ash is temporarily exposed and regraded.

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 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 Bottom Ash Pond Complex

3.2.1 Overview

The Bottom Ash Pond Complex is no longer receiving CCR material. The Bottom Ash Pond Complex received CCR from the Philo Plant from 1924 through 1975. The Bottom Ash Pond Complex was closed in 1990 under applicable state regulations at the time.

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 Bottom Ash Pond Complex has been closed. 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 is mulched, hydroseed will be applied immediately, or as soon as practicable for dust control and temporary stabilization. Once clearing and contouring are complete, a topsoil substitute, biotic soil medium, and hydroseed will be applied 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 the integrity is compromised, the vegetative cover will be repaired to prevent fugitive dust emissions.

3.3 Fly Ash Pond

3.3.1 Overview

The Fly Ash Pond is no longer receiving CCR material. The Fly Ash Pond received CCR from the Philo Plant from 1924 through 1975. The Fly Ash Pond was closed in 1990 under applicable state regulations at the time.

For the emergency repair to the Fly Ash Pond dike, water trucks will be deployed as necessary based on daily inspections and observations. Once grading and contouring are complete, a topsoil substitute, biotic soil medium, and hydroseed will be applied across the disturbed area for dust control and long-term stabilization.

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 Fly Ash Pond has been closed. 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 is mulched, hydroseed will be applied immediately, or as soon as practicable for dust control and temporary stabilization. Once clearing and contouring are complete, a topsoil substitute, biotic soil medium, and hydroseed will be applied 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 the integrity is compromised, the vegetative 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 Bottom Ash Pond Complex and Fly Ash Pond are routinely evaluated to determine if the control measures described above are being implemented as necessary to minimize fugitive emissions. The Site Contact 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 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 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 onto 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 to 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 Compliance at Philo" 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.

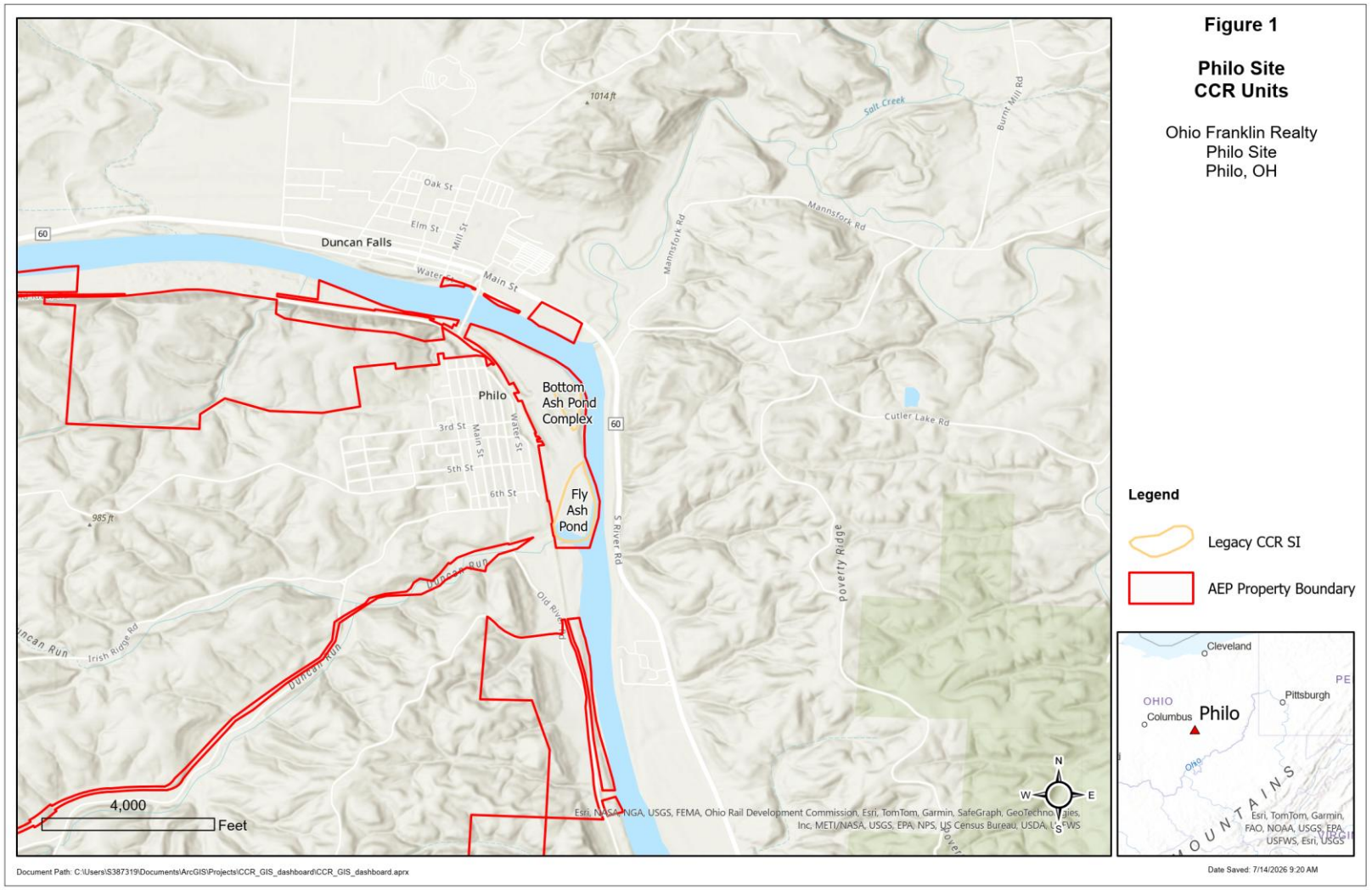
(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

(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


Figure 1
Philo Site
CCR Units
Ohio Franklin Realty
Philo Site
Philo, OH
Duncan Falls
Philo
Bottom Ash Pond Complex
Fly Ash Pond
Main St
Water St
3rd St
5th St
6th St
Oak St
Elm St
Mill St
Mannsfork Rd
Salt Creek
Burnt Mill Rd
Cutler Lake Rd
S River Rd
Poverty Ridge
Irish Ridge Rd
Duncan Run
Old River Rd
1014 ft
985 ft
60
4,000
Feet
N
W
E
S
Legend
Legacy CCR SI
AEP Property Boundary
Cleveland
Pittsburgh
Columbus
OHIO
Philo
Esri, NASA, NGA, USGS, FEMA, Ohio Rail Development Commission, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS
Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS, Esri, USGS
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Appendix C – Site Aerial View


Figure 2
Philo Site
CCR Units
Ohio Franklin Realty
Philo Site
Philo, OH
Bottom Ash Pond Complex
Fly Ash Pond
Philo
Philo Junior High School
Muskingum River
Old River Rd
Main St
Water St
Sugargrove Rd
Mannsfork Rd
S River Rd
James St
1st St
2nd St
4th St
5th St
Clark St
Duncan Run Rd
Pearl St
Market St
Front St
Spring St
Harris St
Legend
Legacy CCR SI
AEP Property Boundary
Cleveland
Pittsburgh
Columbus
OHIO
1,000
Feet
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Appendix D – Plan Modification Documentation

Record of Plan Revisions		
Revision Number	Date	Revision Description
0	11/8/2024	Initial Plan
1	6/15/2025	Update to cover tree clearing activities and re-establishment of final vegetative cover.
2	7/29/2026	Property boundary and administrative updates
3	10/26/2026	Emergency repair work included