WHEELING POWER COMPANY

MITCHELL PLANT



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

Wheeling Power Company Mitchell Plant 8999 Energy Rd.

Moundsville, WV 26041

and

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

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Table of Contents

1.0	Introduction1
2.0	Facility Description and Contact Information1
	2.1 Facility Information1
	2.2 Contact Information1
	2.3 Facility Description
3.0	Fugitive Dust Controls
4.0	Citizen Complaint Log
	4.1 Plant Contacts
	4.2 Follow-up
	4.3 Corrective Actions and Documentation
5.0	Plan Assessment4
6.0	Recordkeeping, Notification and Internet Requirements4
	6.1 Recordkeeping
	6.2 Notification
	6.3 Internet Site Requirements

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 September 15, 2021 to September 15, 2022. The Annual Report is deemed complete when it is placed in the facility's operating record as described in Section 6.0. 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 and on Mitchell Plant's publicly accessible internet website titled "CCR Rule Compliance Data and Information" as described in Section 6.0.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

General Information:

Name of Facility: Wheeling Power Company – Mitchell Plant				
Street: <u>8999 Energy Rd.</u>				
City: Moundsville		State: <u>WV</u>	ZIP Code: <u>26041</u>	
County: Marshall				
Latitude: <u>39º 49' 46'' N</u>	Longitude: <u>80º 48' 5</u>	<u>8'' W</u>		

2.2 Contact Information

Facility Operator:

Name: Wheeling Power Company – Mitchell Plant Attention: Douglas J. Rosenberger - Plant Manager Address: <u>8999 Energy Rd.</u> City, State, Zip Code: Moundsville, West Virginia 26041

Facility Owner:

Name: Kentucky Power Company/Wheeling Power Company Attention: Scott A. Weaver – Director, AQS Address: 1 Riverside Plaza City, State, Zip Code: Columbus, Ohio 43215

Plan Contact:

Name: Matt Palmer – Mitchell Plant Environmental Coordinator Address: <u>8999 Energy Rd.</u> City, State, Zip Code: Moundsville, West Virginia 26041 Telephone number: 304-843-6048 Email address: <u>gmpalmer@aep.com</u>

2.3 Facility Description

The Mitchell Plant is located along the Ohio River near Moundsville, West Virginia, and consists of a two coal-fired, steam electric generating units, each nominally rated at 800 megawatts. Kentucky Power Company co-owns the facility with Wheeling Power Company. Kentucky Power Company operated the facility through the end of August, 2022, when operation responsibility was transferred to Wheeling Power Company. See the Plan for a further description of plant activities and fugitive dust controls.

3.0 FUGITIVE DUST CONTROLS

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

Plant Activity	Fugitive Dust Control Measures
Plant and Landfill Roadways	Roadways were watered as needed and speed control measures were implemented; material carried off plant property and deposited onto public highways by vehicular traffic or erosion by water was removed and disposed of properly.
Landfill – unloading and placement of material	Unloading emissions were controlled by maintaining moisture in the material, taking precautionary measures (minimizing drop height) and watering as needed; spreading and compacting emissions were controlled by maintaining vehicle speed, maintaining moisture in the material, and watering as needed.
Landfill – wind erosion	Wind erosion control measures for open areas included: precautionary measures such as minimizing the amount of open area and pile height; compacting material as it was unloaded; maintaining moisture content of the materials, and watering as needed.
Bottom Ash Pond	Emissions were controlled by the inherent moisture of the material and timely loading of trucks; and watering as needed. The BAP is currently being transitioned to a dry bottom ash handling system that utilizes dewatering conveyors. The dewatered bottom ash is temporarily stored in an ash bunker before being loaded into trucks. Again, the inherent moisture of the material and timely loading of trucks help minimize emissions.

Note: 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.

4.0 CITIZEN COMPLAINT LOG

4.1 Plan Contacts

Generally, complaints made to the plant are by telephone and received by the Plant Environmental Coordinator (Plan Contact). In the case of holiday, weekends, or other times when the Plant Environmental Coordinator may not be onsite, the plant guard house or plant general phone number may receive complaint information by telephone that is provided to the Plant Environmental Coordinator at the earliest convenience. Complaints may also be made to West Virginia DEP who in turn will contact the Plant Environmental Coordinator. The Plant Environmental Coordinator was notified of one fugitive dust complaint during the period covered by this annual report. On September 2, 2022 at 11:30 am, a telephone call was received from Mr. Al Carducci (WVDEP Enforcement Inspector). Mr. Carducci indicated that he had received a message from the WV State Police about material dropping from the gypsum conveyor belt that crosses St. Rt. 2. Plant staff immediately drove to the location of the conveyor crossing but no fugitive dust was present (it was noted that conveyor was not in operation) and no material was observed on St. Rt. 2. After a follow up call with Mr. Carducci, we received clarification that the dust appeared to be originating from a conveyor take up pulley east of the roadway. A second observation, with the conveyor in service, revealed a small amount of fugitive dust being emitted at the take up pulley. Maintenance crews worked to clean any accumulated gypsum from the take pulley equipment, Equipment was also inspected to ensure that it was operating as designed and to determine whether any repairs were necessary. A follow up email detailing findings was drafted and sent to Mr. Carducci on September 08, 2022.

4.2 Follow-up

All complaints will be entered into a log by the Plant Environmental Coordinator 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. One fugitive dust complaint follow up was triggered during this reporting period. The follow up is detailed in the previous section 4.1.

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 corrective actions, it will be amended in accordance with the Plan. If possible, the Plant Environmental Coordinator will follow-up with the complainant and/or West Virginia DEP to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report. One fugitive dust complaint was received during the reporting period. Corrective actions are described in section 4.1. It was determined that no amendment of the fugitive dust plan was necessary in response to the fugitive dust complaint event.

5.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended. The Plant Environmental Coordinator 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 (and any subsequent amendment of the plan) will be kept in the facility's operating record as they become available. The Plan and files of all related information will be maintained in the operating record for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, record or study. Only the most recent Plan must be maintained in the operating record. Files may be maintained on a computer or storage system accessible by a computer. One recordkeeping system may be used for the BAP and Landfill if the system identifies each file by the name of each unit (i.e. BAP or Landfill).

6.2 Notification

The West Virginia DEP will be notified within 30 days of when 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.

6.3 Internet Site Requirements

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