

Appalachian Power Company Clinch River Plant

Coal Combustion Residuals Fugitive Dust Control Plan

Original – April 2017

Revision 2 – August 2019



Prepared by:

**Appalachian Power Company
Clinch River Plant**

3464 Power Plant Road
Cleveland, Virginia 24225

and

**American Electric Power Service Corporation
Environmental Services**

1 Riverside Plaza
Columbus, Ohio 43215

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

058541

VIRGINIA

08.06.19

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 will be placed in the operating record. The Plan and subsequent amendments will also be placed on Clinch River 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 construction and operation of a new CCR unit. Where appropriate, the Plan incorporates fugitive dust control requirements as contained in the Virginia Department of Environmental Quality air permits issued for the plant.

There was one inactive CCR surface impoundment unit for storing CCR located at the Clinch River Plant that was subject to the Plan (Ash Pond 1). However, Ash Pond 1 was permanently closed and capped in July, 2018. As a result, there are no CCR fugitive dust emissions at the pond or associated roadways. The Plan continues to be maintained but there are no CCR fugitive dust emissions to be minimized at the plant.

2.0 Facility Description and Contact Information

2.1 Facility Information

Name of Facility: Appalachian Power Company – Clinch River Plant

Street: 3464 Power Plant Road

City: Cleveland

State: Virginia

Zip Code: 24225

County: Russell

Latitude: 36° 56' 00" N

Longitude: 82° 11' 59" W

2.2 Contact Information

Facility Operator

Name: Appalachian Power Company – Clinch River Plant

Attention: Robert A. Jessee, Plant Manager

Street: 3464 Power Plant Road

City: Cleveland

State: Virginia

Zip Code: 24225

Facility Owner

Name: American Electric Power

Attention: Scott A Weaver – Director, AQS
Street: 1 Riverside Plaza
City: Columbus
State: Ohio
Zip Code: 43215

Plant Contact

Name: Karen M. Gilmer - Plant Environmental Coordinator– Clinch River Plant
Street: 3464 Power Plant Road
City: Cleveland
State: Virginia
Zip Code: 24225
Telephone Number: 276-889-7314
E-mail Address: kmgilmer@aep.com

2.3 Facility Activities

Appalachian Power Company (APCO), a wholly owned subsidiary of American Electric Power, owns Clinch River Plant. The Clinch River Plant is located along the Clinch River near Cleveland, Virginia, and consists of two electric generating units, Unit 1 and Unit 2, each nominally rated at 245-megawatt. A third coal fired generating unit was retired from service in June of 2015. Historically, approximately 430 thousand tons of coal per year was combusted to generate electricity at the Clinch River Plant. Beginning in October of 2015, some equipment on these two units was exchanged to convert the fuel from coal to natural gas. Since their conversion, these units have been producing power for homes, businesses, schools, and industrial facilities while only burning natural gas.

Prior to conversion to burning solely natural gas, bottom ash was produced by the Clinch River Plant Units and was wet sluiced to Ash Pond 1. The pond system allowed ash to be reclaimed while another portion of the pond system remained in service.

As a result of the fuel conversion, no coal combustion residuals (bottom ash or fly ash) are produced during the combustion of natural gas. The fuel conversion included removing the ash handling systems from operation, including the Bottom Ash Pond system.

2.4 Site Maps

A USGS site location map for the Plant is included in Appendix B. A site location map of the Ash Pond 1 is contained in Appendix C.

3.0 Fugitive Dust Controls

3.1 Paved and Unpaved Roadways

CCR fugitive dust control measures are no longer applicable since Ash Pond 1 has been permanently closed and capped.

3.2 Bottom Ash Pond

CCR fugitive dust control measures are no longer applicable since Ash Pond 1 has been permanently closed and capped.

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 1 and associated paved and unpaved roadways are observed for visible emissions on a weekly basis. The purpose of the observation is to determine if any control measures are necessary to minimize or eliminate fugitive emissions. Records of observations will be maintained. The PEC will review the observation records annually to assess the effectiveness of the Plan and to determine if measures are warranted. No observation is necessary if the surface is covered with snow and/or ice or if precipitation has occurred.

5.0 Citizen Complaints

5.1 Plant Contacts

Generally, complaints made to the plant are by telephone and received by the Plant Environmental Coordinator (PEC) (Plan Contact). In the case of holidays, weekends, or other times when the PEC may not be onsite, the plant guard house or plant general phone number may receive complaint information by telephone and that information is forwarded to the PEC at the earliest convenience. Complaints may also be made to VADEQ 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, discussions 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 possible, the PEC will follow-up with the person making the complaint and/or VADEQ 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 Plan into the operating record and annually afterwards. 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 Records, Notification and Internet Requirements

8.1 Records

The Plan and files of all related information will be maintained in a written operating record 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. 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

The Regional Director, VADEQ - SWRO 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 that business day. 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

Air Criteria of 40 CFR Part 257.80
and 40 CFR Part 257.100

Operating Criteria

§ 257.80 Air criteria.

(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion 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 of a CCR unit 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 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 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).

CCR Extension Rule Language:

§ 257.100 Inactive CCR surface impoundments.

(e) Timeframes for certain inactive CCR surface impoundments

(4) Operating criteria. The owner or operator of the inactive CCR surface impoundment must:

(i) No later than April 18, 2017, prepare the initial CCR fugitive dust control plan as set forth in § 257.80(b).

(ii) No later than April 17, 2018, prepare the initial inflow design flood control system plan as set forth in § 257.82(c).

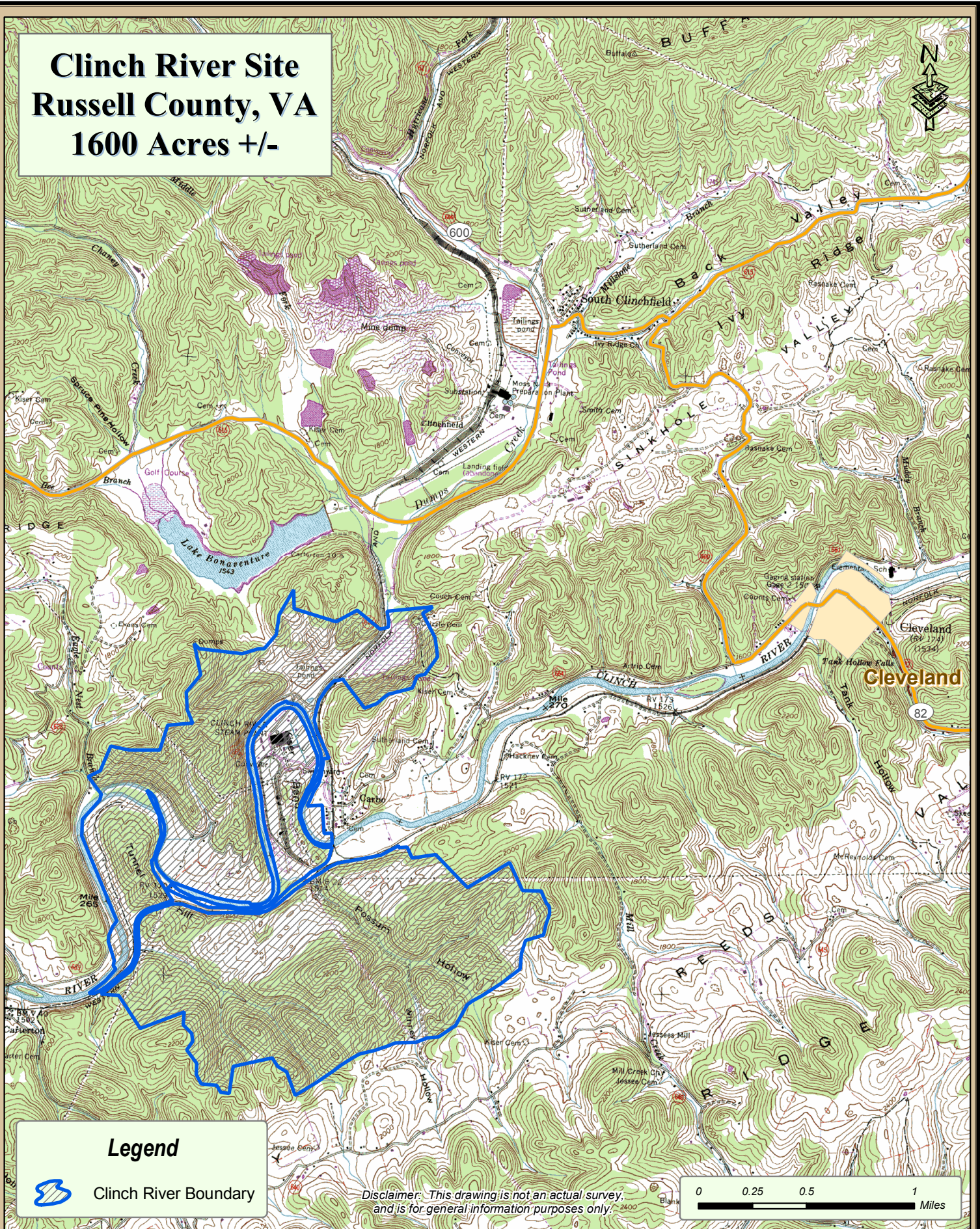
(iii) No later than April 18, 2017, initiate the inspections by a qualified person as set forth by § 257.83(a).

(iv) No later than July 19, 2017, complete the initial annual inspection by a qualified professional engineer as set forth by § 257.83(b).


Appendix B

USGS Site Map
Plot Plan (CRP-13-5024-19B)

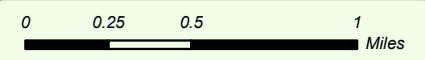
Clinch River Site Russell County, VA 1600 Acres +/-



Legend

 Clinch River Boundary

Disclaimer: This drawing is not an actual survey, and is for general information purposes only.



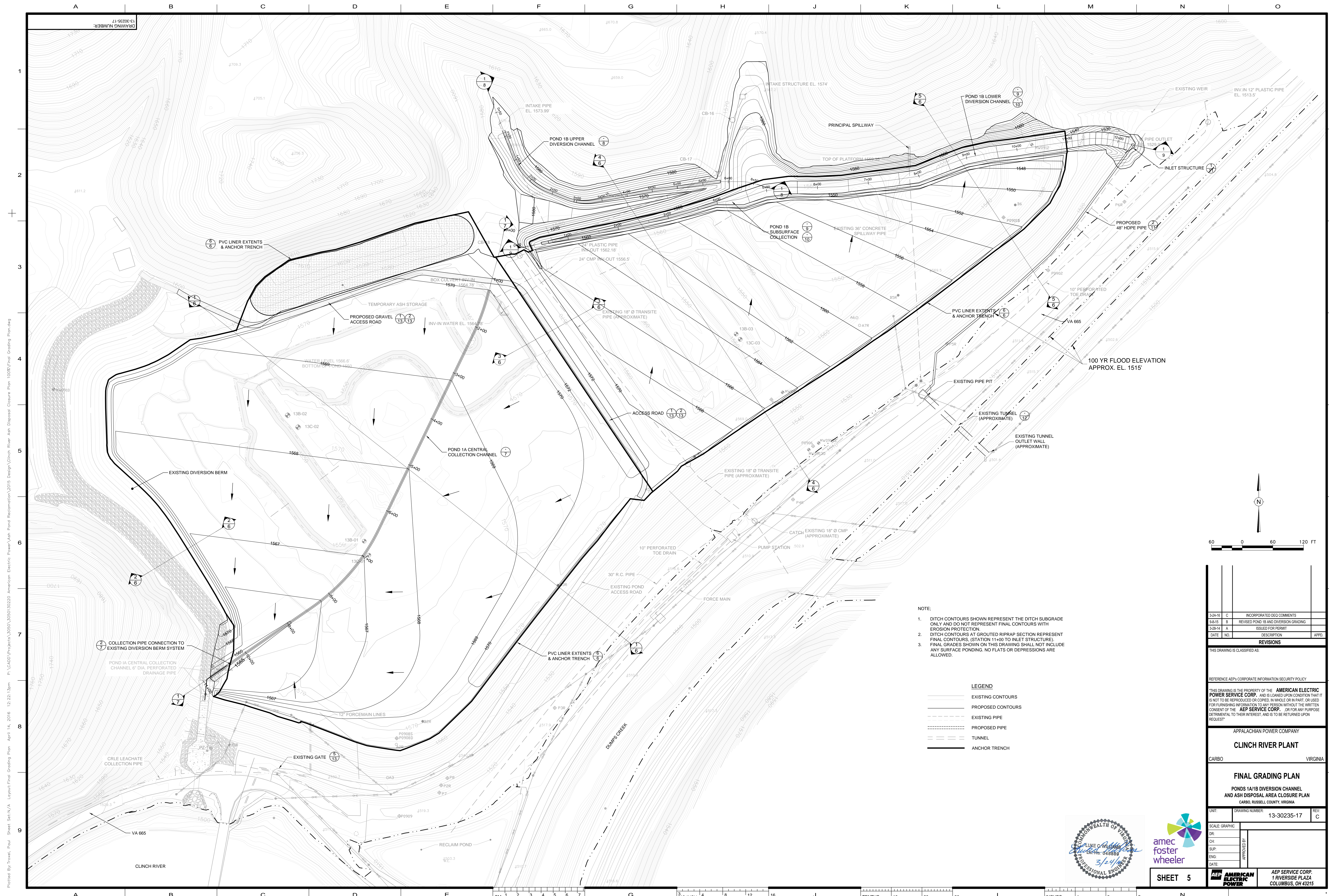
March 10, 2008

Cartography: AEP Real Estate Asset Management Dept.

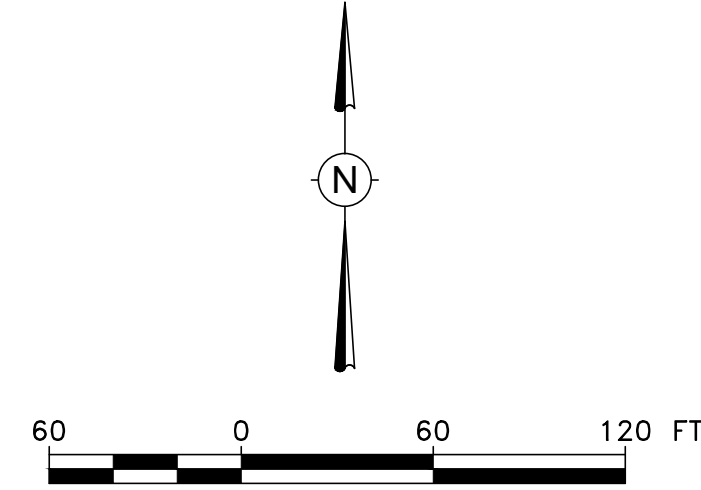
Appendix C

Bottom Ash Pond Site Plan

CROSS REFS.



Project: Power Ash Pond Remediation 2015 Design/Clinch River Ash Disposal Closure Plan 100% Final Grading Plan.dwg
 P:\CAD\Projects\2015\2015032020 American Electric Power Ash Pond Remediation 2015 Design\Clinch River Ash Disposal Closure Plan 100% Final Grading Plan.dwg
 Sheet: 5 of 10
 Date: April 14, 2016 12:22:13pm
 Author: Luke C. Williams
 Checked: Paul Sheetz, N/A
 Plotted: 3/24/16



- NOTE:
- DITCH CONTOURS SHOWN REPRESENT THE DITCH SUBGRADE ONLY AND DO NOT REPRESENT FINAL CONTOURS WITH EROSION PROTECTION.
 - DITCH CONTOURS AT GROUTED RIPRAP SECTION REPRESENT FINAL CONTOURS. (STATION 11+00 TO INLET STRUCTURE)
 - FINAL GRADES SHOWN ON THIS DRAWING SHALL NOT INCLUDE ANY SURFACE PONDING. NO FLATS OR DEPRESSIONS ARE ALLOWED.

LEGEND

	EXISTING CONTOURS
	PROPOSED CONTOURS
	EXISTING PIPE
	PROPOSED PIPE
	TUNNEL
	ANCHOR TRENCH

DATE	NO.	DESCRIPTION	APPRO.
3-24-16	C	INCORPORATED DEO COMMENTS	
3-24-16	B	REVISED POND 1B AND DIVERSION GRADING	
3-28-14	A	ISSUED FOR PERMIT	

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APPALACHIAN POWER COMPANY
CLINCH RIVER PLANT
 CARBO VIRGINIA

FINAL GRADING PLAN
 PONDS 1A/1B DIVERSION CHANNEL
 AND ASH DISPOSAL AREA CLOSURE PLAN
 CARBO, RUSSELL COUNTY, VIRGINIA

UNIT:	DRAWING NUMBER:	13-30235-17	REV:	C
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SCALE GRAPHIC	DATE:	3/24/16
DR:	APPROVED BY:	
CH:	PROFESSIONAL ENGINEER	
SUP:		
ENG:		



SHEET 5

AEP SERVICE CORP.
 1 RIVERSIDE PLAZA
 COLUMBUS, OH 43215

CROSS REFS.

Appendix D

Record of Plan Amendments

Record of Plan Changes		
Revision Number	Date	Description of Change
0	4/17/2017	Initial Plan
1	4/25/2019	Change names of facility owner and facility operator; Update Introduction, Fugitive Dust Controls, Plan Assessment, Records, and Appendix C due to permanent closure and capping of Ash Pond 1
2	8/5/2019	Add original issuance date to title page