

# **AEP Generation Resources Gavin Plant**

## **Coal Combustion Residuals Fugitive Dust Control Plan**



**Prepared By:  
AEP Generation Resources  
Gavin Plant  
7397 N. State Route 7  
Cheshire, OH 45620**

**and**

**American Electric Power  
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).**

THOMAS E. WEBB

Printed Name of Registered Professional Engineer

Thomas E Webb

Signature

45610

Registration No.

OHIO

Registration State

09.21.15

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 and subsequent amendments will be placed in the operating record and retained in the office of the Gavin Plant Environmental Coordinator (PEC). The Plan and subsequent amendments will also be placed on Gavin 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 the construction and operation of a new CCR unit. Where appropriate, the Plan incorporates fugitive dust control requirements as contained in the Ohio EPA air permits issued for the plant.

There are two CCR surface impoundments and one CCR landfill located at Gavin Plant that is subject to the Plan. The surface impoundments are the bottom ash pond (BAP) and the inactive fly ash pond (FAP). The Gavin Residual Waste Landfill (Landfill) receives mostly (~97%) flue gas desulfurization product, but also receives relatively small and miscellaneous amounts of bottom ash, fly ash, rejects from the pulverizers and lime ball mills, and bottom ash pond sediments. The Plan addresses these CCR units and the associated paved and unpaved roadways.

## 2.0 Facility Description and Contact Information

### 2.1 Facility Information

Name of Facility: AEP Generation Resources, Inc. – Gavin Plant

Street: 7397 N St Rt #7

City: Cheshire

State: Ohio

Zip Code: 45620

County: Gallia

Latitude: 38° 56' 9" N

Longitude: 82° 7' 6" W

### 2.2 Contact Information

#### Facility Operator

Name: AEP Generation Resources, Inc. – Gavin Plant

Attention: Robert Jessee - Plant Manager

Street: 7397 N St Rt #7

City: Cheshire

State: Ohio

Zip Code: 45620

Facility Owner

Name: AEP Generation Resources, Inc.  
Attention: John Hendricks – Director, AOS  
Street: 1 Riverside Plaza  
City: Columbus  
State: Ohio  
Zip Code: 43215

Plant Contact

Name: Doug Workman - Plant Environmental Coordinator– Gavin Plant  
Street: 7397 N St Rt #7  
City: Cheshire  
State: Ohio  
Zip Code: 45620  
Telephone Number: (740) 925-3135  
E-mail Address: deworkman@aepes.com

2.3 Facility Activities

The Gavin Power Plant is located along the Ohio River at Cheshire, Ohio, and consists of two electric generating units. AEP Generation Resources, Inc. owns Gavin's Unit 1 and Unit 2, each nominally rated at 1300 megawatts. Coal is combusted and its energy is converted to electricity, powering thousands of homes, businesses, schools, and industrial facilities. Approximately 6.4 million tons of coal was burned in 2014 at the Gavin Plant.

Both units are equipped with lime spray tower flue gas desulfurization (FGD) technology that produces flue gas desulfurization waste (FGD Waste) as a by-product. The FGD Waste slurry is dewatered, stabilized with fly ash and lime then transported by conveyor and truck to the Landfill. The FGD stabilized product consists of about 57% FGD filter cake (calcium sulfite/sulfate), 40% fly ash and 3% lime. The Landfill is located on Plant property approximately 1.25 miles northwest of the FGD systems.

Bottom ash is produced by both Gavin Units and is wet sluiced to the BAP during unit operations. The bottom ash is routinely reclaimed from the pond, loaded into trucks and transported to the Landfill for storage and use as a road construction material within the confines of the landfill. Bottom ash that is not used for construction purposes will be placed within the Landfill.

The fly ash handling system is enclosed. Both units are equipped with electrostatic precipitators. Fly ash is removed from the flue gas in the electrostatic precipitator and collected in hoppers located along

the bottom of the electrostatic precipitator. Fly ash is removed from the hoppers using a vacuum system and transferred to silos for temporary storage prior to being mixed with the FGD waste and conveyed and trucked to the Landfill.

The Fly Ash Impoundment has not been used since January 1995 when the plant converted to a dry ash handling system in conjunction with the FGD scrubber start-up. This impoundment is being closed.

## 2.4 Site Maps

A USGS site location map for the Plant and the plot plan of the site is included in Appendix B. Appendix C contains a site location map for the fly ash pond and Landfill.

## 3.0 Fugitive Dust Controls

### 3.1 Paved and Unpaved Roadways

#### 3.1.1 Overview

Trucks and conveyors are used to transport CCR to the Landfill from the plant site. The fly ash and FGD waste mixture is hauled from the conveyor load-out pile over plant paved roadways at the Landfill. Within the landfill site, the trucks travel a short distance over paved roadways to the disposal area, followed by unpaved roadways that vary with the location of the active fill area. Similarly, bottom ash trucks travel approximately 2.5 miles over paved plant and landfill roadways to the disposal area of the landfill. The applicable and adequate fugitive dust control measures were primarily selected in accordance with the measures contained in Ohio EPA Air Permit to Install (PTI) for the landfill roads and the Title V permit for the plant roads. The roadways are also subject to visible emission limits as contained in the air permits.

#### 3.1.2 Landfill and Plant Roadways

The primary appropriate and applicable fugitive dust control measures for roadways are watering, sweeping, and speed controls. Water trucks are used as needed based upon weather conditions, the daily inspections, and other observations to minimize or eliminate fugitive dust. Chemical suppressants or stabilizers may also be used on unpaved roadways depending on specific site conditions. Posted speed limits are 15 mph for paved and unpaved roads. Earth or other materials that may be deposited onto paved roadways from trucks will be promptly removed to minimize fugitive emissions. 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.

### 3.2 Landfill

### 3.2.1 Overview

The landfill receives mostly (~97%) FGD waste mixed with fly ash and lime from the Gavin Plant. The end product contains about 40% moisture sufficient to prevent wind dispersal but water or chemical suppressants may be added at the landfill as necessary to minimize fugitive dust emissions as the material dries. The landfill activities are subject to Ohio EPA Air Permit to Install (PTI) No. P0108648. This permit specifies the applicable and appropriate fugitive dust control measures for the FGD Storage Piles to minimize or eliminate fugitive emissions. The permit also includes visible particulate emissions limits as well as monitoring, recordkeeping and reporting requirements.

### 3.2.2 Unloading and Placement

FGD Waste is unloaded from trucks in the active fill area of an open landfill cell, where a bulldozer or similar equipment will spread and compact the materials. A roller may also be used for compaction. Bottom ash is unloaded from trucks into a storage pile for use in construction or disposal within the landfill. The fugitive dust control measures for truck unloading includes maintaining moisture in the material and taking precautionary measures (minimize drop height). The measures for spreading and compacting include maintaining vehicle speed and watering materials.

### 3.2.3 Wind Erosion

Generally, landfill disposal areas can be classified as closed or open. Closed areas have received final cover and vegetation has been established. Open areas contain both the active fill area and areas that have been compacted but not yet received final cover. The open area fugitive dust control measures include: precautionary measures such as minimizing the amount of open area and pile height; compacting material as it is unloaded; watering; and application of chemical suppressants. The bottom ash storage pile fugitive dust emissions are minimized by watering, application of chemical suppressants and pile height control.

### 3.3 Fly Ash Reservoir

The Gavin Plant fly ash pond is no longer used for collecting fly ash from the operating units. This pond is being closed in accordance with OEPA wastewater Permit-to-Install regulations that require dewatering and capping. Due to the wet condition of the ash and location of the pond surface below the dam and valley wall elevations, the pond typically has no fugitive emissions. However, certain seasonal weather conditions combined with pond water levels may create dry areas within the pond which may result in windblown fugitive dust from the pond surface. A review of potential control measures concluded that very limited options are applicable and appropriate since the unstable surface of the pond will not support the application of water, chemical suppressants, or cover materials. Wind barriers and enclosures are not appropriate due to the very large surface area of the pond. However, the pond level may be adjusted to inundate the exposed dry areas and minimize dusting. The applicable and appropriate fugitive dust control measure is to adjust the pond water level, when practicable.

### 3.4 Bottom Ash Pond

Bottom ash is produced during operation of the Gavin steam generators and is wet sluiced to the BAP during unit operations. Bottom ash is routinely reclaimed from the pond, loaded into trucks and transported to the Landfill for storage and use as a construction material. Ash is dredged from the pond and piled within the pond confines where it gradually dewater. The ash is then loaded onto trucks for transport to the landfill. While the bottom ash typically remains wet, depending on the amount of moisture remaining in the ash and seasonal conditions, there may be fugitive emissions from the pile or truck loading activities. A review of potential control measures concluded that the applicable and appropriate options consist of: watering, chemical suppressant application, wind barriers, pile height and minimizing drop height. Water or chemical dust suppressant is applied to the pile to minimize fugitive emissions as needed. Water spray is applied as needed to the material handling activities and the drop height from the loader into the trucks is minimized to further control fugitive emissions. Enclosures, compaction and daily cover are not applicable given the size of the area and characteristics of the material.

#### **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 landfill storage piles and associated paved and unpaved roadways are inspected on a daily basis. The purpose of the inspections is to determine if the control measures for each CCR unit as described above are being implemented as necessary to minimize or eliminate fugitive emissions. Records of inspections and the control measures implemented as a result of the inspections are maintained according to the air Gavin Title V air permit. The Plant Environmental Coordinator (PEC) will review the inspection records annually to assess the effectiveness of the Plan and determine if additional or modified measures are warranted. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

#### **5.0 Citizen Complaints**

##### **5.1 Plant Contacts**

Generally, complaints made to the plant are by telephone and received by the PEC (Plant Contact). In the case of holiday, 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 then provides the information to the PEC at the earliest convenience. Complaints may also be made to Ohio EPA who in turn will contact the PEC.

##### **5.2 Follow-up**

All complaints will be entered into a log maintained 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, discussing conditions 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 complainant and/or Ohio EPA 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 to include 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 initial CCR fugitive dust control plan in the facility'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 report 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 conditions 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 E. 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 at the facility 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 an electronic storage system accessible by a computer. One recordkeeping system may be used for the BAP, FAP and Landfill if the system identifies each file by the name of each unit (i.e. BAP, FAP, or Landfill). 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**

Ohio EPA Director and the SEDO will be notified within 30 days of placing the Plan (or any subsequent amended Plan) or the Annual Report into 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. [§ 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

## **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).

# Appendix B

## Site Map for the Plant/Bottom Ash Pond

Images: - Addison Ohio Quad Map.tif - Cheshire Ohio Quad Map.tif - gallsa.tif  
 Xrefs:  
 File Last Updated: Feb 03, 2010  
 Proj Info: 3-5-2010 @ B/Bdam By: MGR/ommeda  
 BSC2M Filename: UDEPTSCAD/Drawing/Project/011-11487-014 V/Reservoir Layout V-Map (2)



USGS Mapping:  
 CHESHIRE QUADRANGLE  
 ADDISON QUADRANGLE



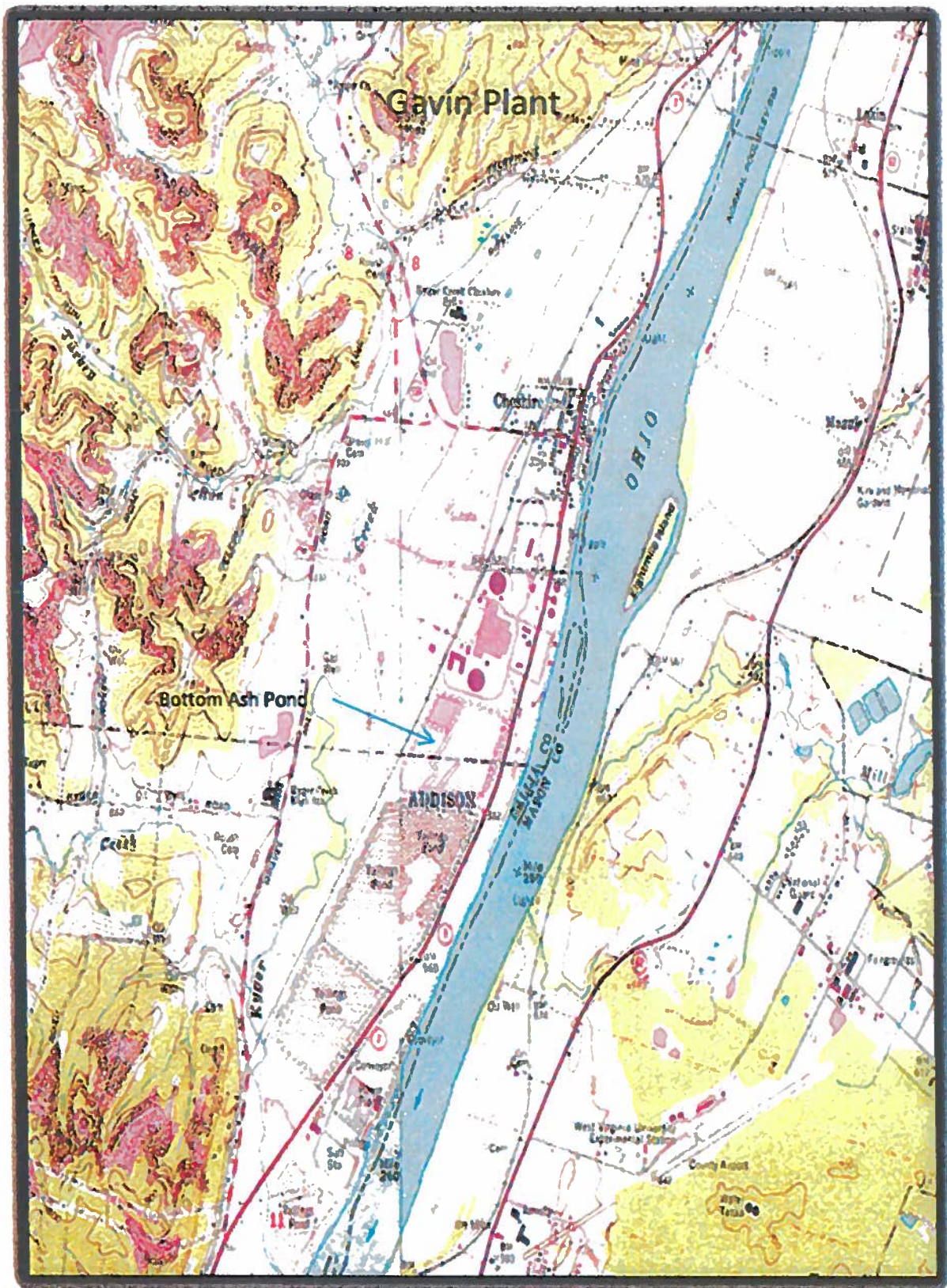
### VICINITY MAP

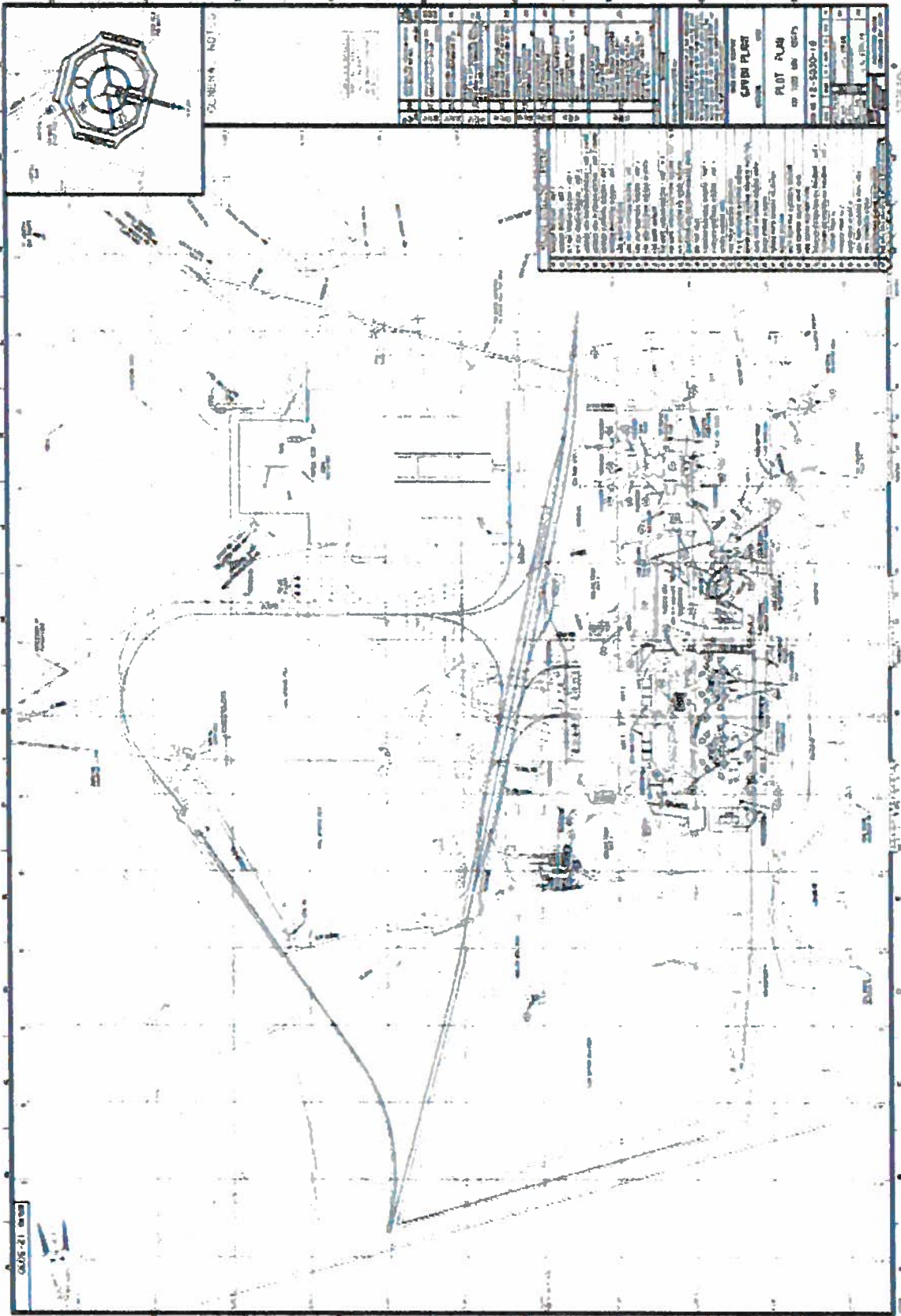
AEP Gavin Plant Supplemental Investigation  
 Stingy Run Fly Ash Reservoir Dam  
 Cheshire, Ohio



Project: 011-11487-014	Drawn By: MTR
Drawing Date: 6-04-2009	Approved By: MGR
Last Updated: 2-3-2010	Scale: 1" = 3000'

Columbus (614) 780-2226  
 Cleveland (216) 801-0200  
 Cincinnati (513) 771-6171  
 Dayton (937) 424-1011

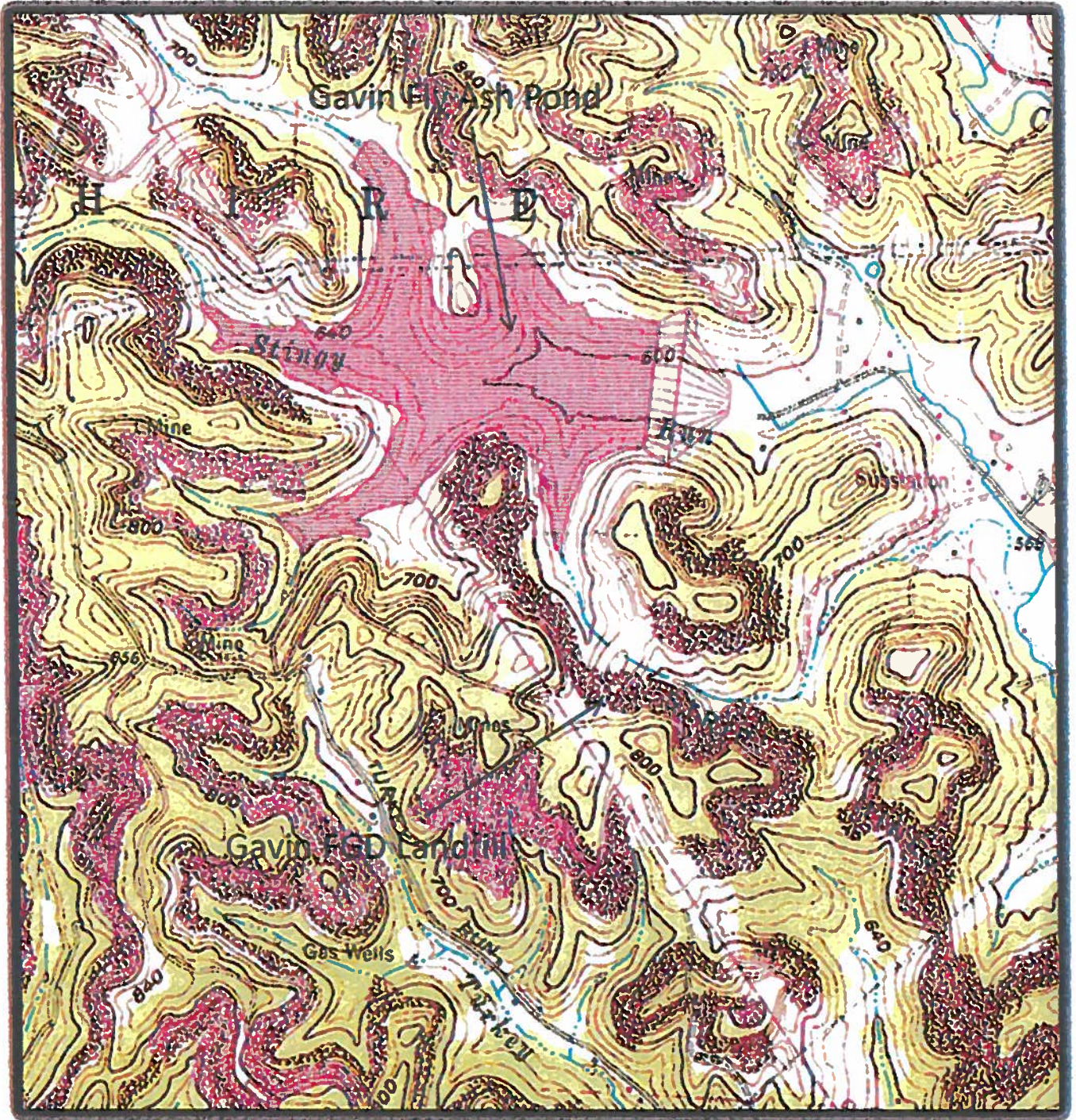






# Appendix C

## Site Map for the Landfill and Fly Ash Pond



# Appendix D

## Record of Plan Amendments

Record of Plan Changes		
Revision Number	Date	Description of Change

(APPENDIX E WILL FOLLOW, WHEN APPROPRIATE.)