

CARDINAL OPERATING COMPANY

CARDINAL PLANT

ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

Cardinal Operating Company
Cardinal Plant
306 County Road 7 East
Brilliant, Ohio 43913

and

Buckeye Power, Inc.
6677 Busch Blvd.
Columbus, Ohio 43229

September 2024

Table of Contents

1.0 Introduction.....	1
2.0 Facility Description and Information	1
2.1 Facility Information	1
2.2 Facility Description	2
3.0 Fugitive Dust Controls	3
4.0 Citizen Complaint Log	4
4.1 Plant Contacts	4
4.2 Follow-up	4
4.3 Corrective Actions and Documentation.....	4
5.0 Plan Assessment	4
6.0 Recordkeeping, Notification and Internet Requirements	5
6.1 Recordkeeping.....	5
6.2 Notification.....	5
6.3 Internet Site Requirements	5

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, 2023 to September 15, 2024. 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 retained in the office of the Cardinal Plant Environmental Manager (PEM). The Plan will also be placed on Cardinal Plant's publicly accessible internet website titled "CCR Rule Compliance Data and Information" as described in Section 6.0.

2.0 FACILITY DESCRIPTION AND INFORMATION

2.1 Facility Information

General Information:

Name of Facility: Cardinal Operating Company – Cardinal Plant

Street: 306 County Road 7 East

City: Brilliant State: Ohio ZIP Code: 43913

County: Jefferson

Latitude: 40° 15' 8" N Longitude: 80° 38' 54" W

Phone: (740) 598-4164

2.2 Facility Description

The Cardinal Plant is located on the shore of the Ohio River at Brilliant, Ohio, and consists of three electric generating units owned by Buckeye Power, Inc. Cardinal Operating Company manages and operates all Cardinal Units. 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 and swept 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. Also, chemical dust suppressants were used on unpaved roadways and parking areas.
Landfill – unloading, storage 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. Storage piles were watered or treated with chemical suppressants as needed. Fly ash is stored in silos, conditionally moisturized and loaded into trucks to be transported to the landfill.
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, watering as needed and applying chemical suppressants. Temporary berms were also used.
Fly Ash Reservoir	Historically, emissions were controlled by the inherent moisture of the material. Since initiating closure, water trucks have been utilized to maintain moisture.
Bottom Ash Pond	Emissions were controlled by the inherent moisture of the material and timely loading of trucks; watering as needed; application of chemical suppressants; berms; and minimizing drop height into trucks during loading.

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 PEM (Plan Contact). In the case of holiday, weekends, or other times when the PEM may not be onsite, the plant guard houses or plant general phone number may receive complaint information by telephone that is provided to the PEM at the earliest convenience. Complaints may also be made to Ohio EPA who in turn will contact the PEM. **No complaints were received by the Plant PEM during the period addressed by this Annual Report.**

4.2 Follow-up

All complaints will be entered into a log by the PEM 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. **No complaint follow-up was necessary during the period addressed by this Annual Report.**

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 PEM 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. **No corrective actions due to complaints were necessary during the period addressed by this Annual Report.**

5.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended. The Fugitive Dust Control Plan was last revised on September 17, 2023 to update the Plan Contact. **The PEM 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 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. Only the most recent Plan must be maintained in the record. Files may be maintained on a computer or storage system accessible by a computer.

6.2 Notification

Ohio EPA 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.