



INDIANA-KENTUCKY ELECTRIC CORPORATION

3932 U. S. Route 23
P. O. Box 468
Piketon, Ohio 45661
740-289-7200

WRITER'S DIRECT DIAL NO:
740-897-7768

December 1, 2020

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bruno Pigott
Commissioner
Indiana Department of Environmental Management
100 N. Senate Avenue
Mail Code 50-01
Indianapolis, IN 46204-2251

**Re: Indiana-Kentucky Electric Corporation
Clifty Creek Station
Notification of CCR Rule Information Posting**

Dear Mr. Pigott:

As required by 40 CFR 257.106(g), the Indiana-Kentucky Electric Corporation (IKEC) is providing notification to the Commissioner (State Director) of the Indiana Department of Environmental Management that the Clifty Creek Station's Annual Fugitive Dust Report, required by 40 CFR 257.80(c), was placed in the facility's Operating Record on December 1, 2020, and has also been placed on the company's publically accessible internet site.

This information can be viewed on OVEC's publically accessible internet site at:
<http://www.ovec.com/CCRCompliance.php>

If you have any questions, or require any additional information, please call me at (740) 897-7768.

Sincerely,

A handwritten signature in black ink that reads "Tim Fulk".

Tim Fulk
Engineer II

TLF:klr

Indiana-Kentucky Electric Corporation

CLIFTY CREEK STATION



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Prepared By:

Indiana-Kentucky Electric Corporation
3932 U.S. Rt. 23
Piketon, Ohio 45661

December 2020

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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: a description of actions taken to control CCR fugitive dust; a record of all citizen complaints; and a summary of any corrective measures taken.

Pursuant to 40 CFR 257.80(c), the initial Annual Report must be completed no later than 14 months after placing the initial Plan in the facility's operating record. The initial Clifty Creek CCR fugitive dust control plan was placed into the operating record on October 19, 2015. This Annual Report addresses the period from October 17, 2019 to October 16, 2020. In accordance with 40 CFR 105(g)(2), 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 Clifty Creek Station Plant Environmental Manager (PEM). The Plan will also be placed on the Indiana-Kentucky Electric Corporation's (OVEC'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: Clifty Creek Station

Street: 1335 Clifty Hollow Road

City: Madison State: IN ZIP Code: 47250

County: Jefferson

Latitude: 38°44'23.49" Longitude: 85°25'18.08"

2.2 Contact Information

Facility Operator:

Name: Indiana-Kentucky Electric Corporation

Mailing Address: P.O. Box 468

Physical Address: 3932 US Route 23

City, State, Zip Code: Piketon, Ohio 45661
Telephone Number: 740-289-7200
Email address: CCRCCompliance@ovec.com

Facility Owner:

Name: Indiana-Kentucky Electric Corporation
Mailing Address: P.O. Box 468
Physical Address: 3932 US Route 23
City, State, Zip Code: Piketon, Ohio 45661

Plan Contact:

Name: Clifty Creek Station Plant Environmental Manager (PEM)
Address: 1335 Clifty Hollow Road
City, State, Zip Code: Madison, IN 47250
Telephone number: 812-265-8700

2.3 Facility Description

The Clifty Creek Power Plant is located on the shore of the Ohio River near Madison, Indiana, and consists of six 217 megawatt electric generating units. Each year, approximately three million tons of coals per year are converted to electricity at the Clifty Creek Station, powering homes, businesses, schools, and industrial facilities.

The generation of electricity using coal as a fuel source produces fly ash, boiler slag, and synthetic gypsum. The Clifty Creek Station is equipped with multiple pieces of environmental control equipment used to collect these materials. See the Plan for a further description of plant activities and fugitive dust controls.

3.0 FUGITIVE DUST CONTROLS – 40 CFR 257.80(b)(1)

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

Plant Activity	Fugitive Dust Control Measures
Plant and Landfill Roadways	Roadways were watered as needed, sweeping, trucks were tarped, speed control measures, and truck washes were continued.
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, watering as needed, and application of temporary cover.
Landfill – wind erosion	Wind erosion control measures for open areas included: precautionary measures such as minimizing the amount of open area; compacting material as it was unloaded; maintaining moisture content of the materials, watering as needed, and placement of intermediate or permanent cover material.
Landfill Runoff Collection Pond	There are typically no emissions due to the fact that this pond collects runoff and leachate. The surrounding areas beyond the pool are maintained as part of the plant and landfill roadways and wind erosion control measures.
West Boiler Slag Pond	There are typically no emissions due to the fact the boiler slag is wet. Emissions were controlled by the pond level. The surrounding areas beyond the pool are maintained as part of the plant and landfill roadways and wind erosion control measures.
Gypsum, FGD WWTP gypsum Filter Cake, Boiler Slag, and Fly Ash Conveyor Transfer	Emissions from the loading of trucks were controlled by the moisture of the material, tarping the trucks and by minimizing the drop height into the trucks.

Note: According to the Station's Title V Air Permit and due to safety concerns, 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 – 40 CFR 257.80(B)(3)

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 as soon as practicable. Complaints may also be made via email at CCRCompliance@ovec.com or to IDEM, who in turn will contact the PEM.

During the period addressed by this report, Clifty Creek Station received one public complaint, detailing fugitive dust issues around the facility's gypsum stackout pad and Trona building.

4.2 Follow-up

As described in the Plan, 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 investigated 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.

As part of Clifty Creek Station's investigation into the issues raised, a careful review of the site's fugitive dust inspection reports was conducted to determine if there were any days on which fugitive dust issues were noted at the site's stack out pad or Trona building. Based on that review, no issues were documented. Additionally, per IKEC's documentation and site observations, fugitive dust is not an issue for the site, nor has an observation been made that it leaves our facility boundary at any location. Clifty Creek will continue to focus energy on maintaining the site in a manner that prevents and controls fugitive dust.

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 40 CFR 257.80(b)(6). If possible, the PEM will follow-up with the complainant and/or IDEM to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the Annual Report.

Corrective action was not necessary at the time of receipt of the public complaint. Should issues of this nature arise, corrective action would align with those fugitive dust controls detailed in the facility's fugitive dust control plan, and likely would include corrective action as detailed in section 3.0 above.

5.0 PLAN ASSESSMENT – 40 CFR 257.80(B)(4)

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended.

IKEC 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.

The fugitive dust plan has been reviewed and is found to be sufficient.

6.0 RECORDKEEPING, NOTIFICATION and INTERNET REQUIREMENTS – 40 CFR 257.80(d)

6.1 Recordkeeping – 40 CFR 257.105(g)

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 – 40 CFR 257.106(g)

The Commissioner of the Indiana Department of Environmental Management 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 – 40 CFR 257.107(g)

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.